



**Final Report on the joint World Heritage Centre / ICOMOS / ICCROM
Advisory Mission to Stonehenge, Avebury and Associated Sites (c.373bis)**

19-21 April 2022



Acknowledgements

The World Heritage Centre/ICOMOS/ICCROM Advisory Mission is grateful to the State Party (The United Kingdom of Great Britain and Northern Ireland), and more specifically to the Department for Digital, Culture, Media and Sport (DCMS), the Department for Transport (DfT), National Highways (Highways) and Historic England (HE), as well as the National Trust (NT), the English Heritage Trust (EHT), Wiltshire Council, and the Stonehenge and Avebury World Heritage Site Partnership Panel, for the excellent mission arrangements, including preparation of the briefing pack, facilitation of site inspections, informative presentations and access to documentation.

Particular acknowledgement is made of the contributions of:

The Honourable Nigel Huddleston, (Parliamentary Under-Secretary of State for Sport, Tourism, Heritage and Civil Society, Department for Digital, Culture, Media and Sport), The Honourable Baroness Vere of Norbiton, (Parliamentary Under-Secretary of State, Department for Transport), Laura Davies, (Permanent Delegate and Ambassador of Great Britain and Northern Ireland to UNESCO), Rachel Heatherly, (UNESCO Policy Lead and SRO, Foreign, Commonwealth & Development Office), Keith Nichol, (Head of Cultural Diplomacy, Department for Digital, Culture, Media & Sport), Henry Reed, (Senior International Policy Adviser, Department for Digital, Culture, Media & Sport), Rebecca Barrett, (Regional Director South West, Historic England), Alexandra Warr, (Head of International Strategy, Historic England), Dr Helen Woodhouse, (Senior International Adviser, Historic England), Councillor Mark McClelland, (Cabinet Member for Transport, Waste, Street Scene and Flooding, Wiltshire Council), Peter Binley, (Director Highways and Transport (Acting), Wiltshire Council), Melanie Pomeroy-Kellinger, (County Archaeologist, Wiltshire Council), Anne Carney, (World Heritage Site Partnership Manager, Stonehenge & Avebury WHS Coordination Unit), Nichola Tasker, (Stonehenge & West Territory Director, English Heritage Trust), Dr Heather Sebire, (Senior Property Curator for Stonehenge, English Heritage Trust), Ingrid Samuel, (Placemaking & Heritage Director, National Trust), Dr Nick Snashall, Archaeologist for the Stonehenge & Avebury World Heritage Site, National Trust), Nick Simms, (Senior Project Manager, Stonehenge Projects, National Trust), Rosemary Hopkins, (Deputy Director for Roads and Projects Infrastructure Delivery, Department for Transport), Derek Parody, (Project Director, A303 Stonehenge, National Highways), David Bullock, (Project Manager, A303 Stonehenge, National Highways, Chris Moore, Technical Partner – Deputy Heritage Lead), Matt Leivers, (A303 Consultant Archaeologist, Wessex Archaeology), Professor Sir Barry Cunliffe, (Chair of Scientific Committee). These individuals (and others) greatly assisted with the efficient and effective conduct of the mission and were responsive and supportive of the many requests for clarification or information.

The Mission also acknowledges the contribution of institutions and individuals from civil society (as listed within Annexure C to this report) for the time, information and viewpoints that contributed to the Mission's understanding of the Stonehenge component of the 'Stonehenge, Avebury and Associated Sites', and the complex and numerous issues surrounding the current project.

Contents

Acknowledgements	2
Executive Summary and List of Recommendations	4
Background	4
Mission Tasks and Programme	5
Findings	5
Recommendations	5
1. Background and Context for the Mission	12
1.1 Justification	12
1.2 Inscription History and Statement of Outstanding Universal Value	12
1.3 Terms of Reference	13
1.4 Mission Team	14
1.5 Mission Programme	14
1.5 Documents Consulted	15
2. Project Overview and Evaluation	18
2.1 Highways England Objectives	18
2.2 Selection Process for the Preferred Route	18
2.3 The A303 and the Stonehenge Landscape	19
2.4 Public Consultation Process	20
2.5 Changes following the 2018 Advisory Mission	21
2.6 Proposed Scheme	23
2.7 Eastern Portal and Approaches	24
2.8 Western Portal and Approaches	26
2.9 Longbarrow Junction and Roundabout	29
2.10 The Tunnel	30
2.11 Landscape Integrity	31
2.12 Archaeological Resource Management	33
2.13 Heritage Management Advisory Group (HMAG)	33
2.14 Scientific Committee	34
2.15 Civil Society	34
2.16 Legacy Benefits	35
2.17 National Highways Response to WHC Decision 44 COM 7.B.61	35
3. Findings and Recommendations	38
3.1 Response to Terms of Reference	38
3.2 Findings	39
3.3 Recommendations	44
4. Annexures	47
A. Statement of Outstanding Universal Value	47
B. Terms of Reference	47
C. Mission Programme	47
D. State Party Personnel	47
E. Mission Briefing Pack April 2022	47
F. Previous Mission Findings and Recommendations	47
G. World Heritage Committee Decisions 2017 – 2021	47

Executive Summary and List of Recommendations

An ICOMOS/ICCROM/UNESCO Advisory Mission was undertaken from 19 to 21 April 2022 to the Stonehenge component (the WHS) of the ‘Stonehenge, Avebury and Associated Sites’ serial World Heritage property, which was inscribed on the World Heritage List in 1986. This Advisory Mission (the Mission), which was conducted at the invitation of the State Party (the United Kingdom of Great Britain and Northern Ireland), reviewed progress on the upgrading the A303 road while also addressing its impact on the Stonehenge landscape and the Outstanding Universal Value (OUV) of the inscribed property.

Background

The A303 Amesbury to Berwick Down Road project (the Scheme), which proposes to upgrade the existing A303 road that transects the Stonehenge component of the WHS, is part of a wider scheme for the A303/A358/A30 route to turn it into a continuous dual carriageway between the south-east and the south-west of England. In March 2020 £1.7 billion was allocated by the UK Government towards implementing the A303 road improvement.

The proposal specifically considered by the Mission includes the following components:

- Relocating 3.3km of the existing A303 surface road through the property within a tunnel;
- Setting the new road in the western part of the property in a deep retained cutting, incorporating a 150m wide land bridge;
- Setting the approach to the eastern portal in a cutting connecting to the existing surface dual carriageway,
- Redundant carriageway largely restored to grass,
- Reuniting the Stonehenge Avenue that is severed by the current A303;
- Replacing the existing Longbarrow roundabout with a new A360 junction, relocated 600m west of the WHS property, removing road infrastructure from the immediate proximity of key barrow groups;
- Upgrading the Countess junction with the A345 on the eastern edge of the WHS property to provide a new flyover; and
- 17km of new and upgraded rights of way both within and in the vicinity of the property to improve connectivity and accessibility for pedestrians, cyclists and horse riders.

Following a lengthy development programme, including previous Advisory missions in 2015, 2017 and 2018, and consideration of Decisions made by the World Heritage Committee between 2017 and 2019 (Decisions 41 COM 7B.56, 42 COM 7B.32, and 43 COM 7B.95), a scheme proposed by National Highways underwent formal Examination in 2019 and was recommended for refusal by the Examining Authority in January 2020. The World Heritage Committee made a further resolution in July 2021 (Decision 44 COM 7B.61), expressing concern that elements of that scheme (particularly at the western end) would “*impact adversely the Outstanding Universal Value (OUV) of the property, especially affecting its integrity*” and requesting that “*the scheme should be modified to deliver the best available outcome for the OUV of the property*”. However, the 2018 scheme was subsequently approved by the Secretary of State for Transport in November 2020. An order of the UK High Court, quashed the Development

Consent Order (DCO) in July 2021. The Secretary of State for Transport will re-determine the Scheme's DCO application. No alterations have been made to the Scheme since consideration by the World Heritage Committee in 2021 and the decision of the High Court.

Mission Tasks and Programme

The Mission inspected the WHS, its setting and surrounding areas, in the company of representatives from the State Party, National Highways, Historic England, the English Heritage Trust, the National Trust, Wiltshire Council and (for part of the inspection) a potentially-affected property owner; received briefings from the project proponents, expert advisers and State Party authorities; met with the Parliamentary Under-Secretary of State for Sport, Tourism, Heritage and Civil Society, the Parliamentary Under Secretary of State for Transport, representatives from civil society; and reviewed the briefing documents provided, in light of the findings and recommendations of the previous Advisory missions, recent decisions of the World Heritage Committee, and the findings of the Examining Authority. The Mission also engaged with a virtual reality interactive and immersive tool which enabled the viewer to explore the Stonehenge landscape from all vantage points, as it is and with the scheme constructed, taking into account different seasons and conditions.

Findings

The Stonehenge component of the 'Stonehenge, Avebury and Associated Sites' property (the WHS), is an incomparable archaeological landscape of interlinked monuments, both standing and subterranean. Currently, the surface highway A303, comprising two lanes, cuts across this landscape from east to west for approximately 5.4km. Removal of the surface highway from this landscape would have a positive impact on the WHS and the OUV of the inscribed property.

The tunnel proposed by the Scheme would remove the road from the central part of the WHS, but the construction of dual carriageway in cuttings at either end of the tunnel would adversely and irreversibly impact on the integrity of the WHS, through removal of archaeological features and deposits, through disrupting the spatial and visual links between monuments, and as a result of its overall visual impact. Because some of these changes would be permanent, their effect would be to add to cumulative adverse impacts on the OUV of the inscribed property.

From the perspective that an objective of the Scheme is to minimize any harm to the OUV of the inscribed property, the Mission considers that additional weight should be afforded to avoiding impact on the property, in view of its 'Outstanding Universal Value' and the obligations of the State Party under the *World Heritage Convention*. The Mission considers that the appropriate 'test' is not whether there is a net benefit to OUV, but rather how any adverse impact on OUV can be avoided.

The Scheme and its routing:

The construction of major infrastructure such as roads, in and in the vicinity of World Heritage properties, has been a concern to the World Heritage Committee owing to the significant negative impacts these features have on the OUV of the property including its authenticity and integrity. In the case of the WHS, the matter is particularly sensitive as the existing road passes close to the iconic ensemble of Neolithic and Bronze age stones as well as a number of other important monuments and other components of the landscape. From this perspective, removing all through traffic from the site would be ideal for the protection of the OUV of the property.

The Mission accepts that the Scheme to upgrade of the A303 with the dual carriageway passing through the heart of the WHS within a tunnel, is the result of methodical and detailed analysis of options to respond to a complex set of demands and needs including those of the communities

and villages around the WHS. However, the major concern expressed by the 2018 Advisory Mission and in World Heritage Committee Decision 44 COM 7B.61 remains, namely that the Scheme (particularly at the western end) would: “*impact adversely the Outstanding Universal Value (OUV) of the property, especially affecting its integrity*” and that: “*the scheme should be modified to deliver the best available outcome for the OUV of the property*”. The Mission recalls the finding of the 2018 Mission that although surface routes outside the WHS to the south performed less well for transport and economy, environment and communities, they could have substantial benefits for the WHS.

Notwithstanding the invitation provided in the ‘Statement of Matters’ issued on behalf of the Secretary of State for Transport dated 30 November 2021, and recent Decisions of the World Heritage Committee, no further consideration or analysis of alternatives has been offered by National Highways. Such alternatives would need to be considered in order to explore fully the available opportunities to avoid impacts on OUV.

An alternative route, which re-routes the A303 completely around the WHS, and enables the complete closure of the existing section of the A303 within the WHS, would provide the best option for minimizing any negative impact and enhancing positive benefits to the OUV of the property.

A tunnel beneath the entire length of the WHS would provide the next best option for the OUV of the inscribed property. Insofar as such a tunnel is not feasible, then the alternative should be to extend the underground section of the Scheme at least to the western boundary, with areas to be excavated subject to comprehensive archaeological investigation, salvage, and mitigation.

The Scheme currently includes a 3.3km twin tunnel, two short, covered sections, plus approximately 2km of dual carriageway in cuttings and a land bridge. The tunnel would remove the road from the central part of the WHS, but the construction of dual carriageways in cuttings at either end of the tunnel would adversely and irreversibly impact on the integrity of the WHS and the OUV of the property, through removal of archaeological features and deposits, through disrupting the spatial and visual links between monuments, and as a result of its overall visual and functional impact, as well as affecting the overall conceptual understanding of the property as being whole and intact.

If it is determined that removal of surface traffic of A303 from the WHS requires a route through the WHS, the proposed Scheme’s alignment is appropriate and has been adjusted to avoid potential conflict with Normanton Barrows and the Stonehenge solstice alignment, moved away from the Winterbourne Stoke Barrow Group and informed by an extensive program of archaeological evaluation.

The State Party has advised that following a proposed ‘setting study’, and having regard to advancements in excavations, research, and understanding of the WHS since its inscription, the boundaries of the property may be revised. The western boundary of the property near the present Longbarrow Junction is one area where some boundary modification may be considered. Hence, this part of the WHS would also be considered particularly significant to the attributes which support the OUV of the property.

The proposed re-location of the Longbarrow junction between the A303 and the A360 outside the property, some 600m to the west would benefit the setting of the Winterbourne Stoke Group

and improve the visual setting of the WHS; however, moving the proposed Longbarrow junction even further to the west would increase these benefits.

The loss of archaeological attributes arising from removal of features and deposits would reduce the cumulative benefits of the scheme.

Response to Committee Decisions and Recommendations of previous Advisory Missions

The State Party and its agencies have responded positively to the recommendations of previous Advisory missions and Decisions of the World Heritage Committee by making changes to the Scheme. However, further changes are required to the western portal design in order to deliver the best available outcome for the OUV of the property, consistent with World Heritage Committee Decision 44 COM 7B.61.

Archaeological investigations undertaken to date have accorded with the recommendations of previous Missions. The *Archaeological Evaluation Strategy* and the *Overarching Written Scheme of Investigation for Archaeological Evaluation* were considered by the 2018 Advisory Mission and have not been re-addressed by the current Mission.

The findings of the 2018 Advisory Mission that the Heritage Monitoring and Advisory Group, in combination with the Scientific Committee provide an appropriate heritage-centred steering mechanism for future stages of decision making and project implementation are supported, and it is apparent and appropriate that the members of the Scientific Committee are empowered to provide unfettered advice.

The Eastern Portal and Approaches

If a tunnel is to be constructed, as the 2018 Advisory Mission and World Heritage Committee have already noted, the proposed eastern portal would have adverse effects arising from removal of subterranean archaeological features, but has been positioned in the least impactful location available which is sufficiently close to the WHS boundary, given the constraints imposed by the attributes of the WHS, other significant sites in the vicinity (including Vespasian's Camp and Blick Mead) and local topographic and environmental conditions.

The location of the eastern portal to the east of The Avenue is an improvement on previous options, although the proposed dual carriageway would still be visible from, and therefore adversely affect, the visual setting of The Avenue.

Although the potential for changes to the water table which affect Blick Mead are low, it would be appropriate to instigate a monitoring regime and to manage any identified effects.

Appropriate community access to, and interpretation of, Blick Mead, Vespasian's Camp, The Avenue and Amesbury Park, would enhance visitor experience of the property and its environs.

The Western Portal and Approaches

The Scheme provides an important one-off opportunity for rehabilitation of the existing intrusive A303, which should be taken to the fullest extent that is reasonably practicable.

The proposed western portal and associated dual carriageway, within a cutting, would have an unacceptable and inappropriate adverse impact on the setting of the Winterbourne Stoke Barrow Group and the physical and visual integrity of the WHS and the Scheme should not proceed without substantial amendment to avoid this impact.

The proposed western portal and associated dual carriageway, within a cutting, would also have an adverse impact on the archaeological resources which would be excavated, and this impact should be minimised.

Extending the proposed tunnel to the west, beyond the boundary of the WHS would enable greater re-connection between the southern and northern sections, an improved setting for the Winterbourne Stoke Group and reduce impacts on archaeological resources within the WHS and on its integrity. However, it is recognised that a longer tunnel would be challenging in view of topographic considerations and design options, and may involve moving the Longbarrow junction back towards the western edge of the WHS.

It is understood that land bridge 4 cannot be made wider than 150m, without becoming a ‘tunnel’, which would require considerable additional infrastructure; therefore, if a wider land bridge or even multiple land bridges were to be considered, it would be preferable to extend the proposed underground section of the A303 further to the west.

If the Scheme proceeds, the minimum change required, in light of the above considerations, would be an extension of the underground section of the western approach (in tunnel and/or cut-and-cover) at least to the western boundary of the WHS. The western portal should be re-located as far to the west as reasonably practical, thereby reducing the length of the cut-and-cover section and minimising the extent of archaeological resources which must be removed.

Before considering the proposed Development Consent Order, the State Party should modify the design of the Scheme to include an extension of the underground section of the western approach (in tunnel or cut-and-cover) at least to the western boundary of the WHS. Ensuring continued stakeholder engagement in these modifications may demand some additional steps such as notifying all parties who participated in the original examination and give them the opportunity of submitting representations on the proposed change. It is recognised that under UK law the steps to approve and implement the modified Scheme may require a series of approvals, but it is strongly advised that the Scheme does not proceed until and unless modified as recommended in this report.

Archaeological Resources

The archaeological features of the WHS are important attributes of the inscribed property that contribute to its intactness and wholeness, and thereby to its integrity. Recognising that if the Scheme proceeds, substantial sections of subterranean archaeological features and deposits will be removed, the extent of such removal should be minimised to the fullest extent that is reasonably practical. At the western end, this would mean moving the western portal as far to the west as possible, thereby reducing the extent of cut-and-cover required to reach the western boundary of the WHS.

In view of the proposed removal of archaeological features and deposits from what is one of the world’s great archaeological landscapes, and the contribution of these elements to the integrity and OUV of the property, should the Scheme proceed, there should be a comprehensive archaeological salvage and mitigation program, consistent with best practice standards and approaches. The methodology, extent, cost and timing of this program should be determined based on expert advice about what is needed to achieve comprehensive archaeological salvage and mitigation.

In light of the diverse opinions expressed by the Scientific Committee on matters such as sampling and recovery, and the opportunities for increasing the understanding of the

archaeological landscape brought by emerging digital technologies, it would be appropriate to facilitate ongoing discussions and consideration of the most appropriate methods to achieve comprehensive archaeological salvage and mitigation.

In the event that unexpected archaeological finds were to occur during the course of the comprehensive archaeological salvage and mitigation program, provision should be made to stop work and evaluate options for improved conservation outcomes, including public communication of discoveries.

Other Findings

The State Party is to be acknowledged for putting in place a number of excellent measures and practices. The willing and regular cooperation between different agencies and sectors, most significantly those related to transport and culture, is commendable and has yielded benefits as the Scheme has been developed with extensive inputs from these different agencies and sectors. Other excellent practices included extensive public consultation, establishment of the HMAG and Scientific Committee, thorough Heritage Impact Assessment processes, and the development of remarkable 3D virtual models to help assess the potential impact of the Scheme on the WHS.

The 3D virtual models paid a great deal of attention to light, including the winter solstice, and the impact of night light, as well as different weather conditions. From these and from discussions, the Mission concludes that the lighting arrangements for the tunnel and the surface of the WHS following the closure of the surface road of A303 would be carefully designed for safety as well as for enhancing the ‘night sky’, an important attribute of the Neolithic and Bronze-age funerary site.

Also, based on consideration of the 3D virtual models and representations from civil society, the Mission concludes that regulations should prevent commercial signs within the WHS.

While the representation within the HMAG is extensive it would benefit from augmentation with addition of expertise in cultural landscape conservation, management and interpretation.

If the Scheme proceeds, the rights of private farmers within the WHS need to be pro-actively protected, including careful attention to new visitor opportunities and circulation patterns, and minimising ancillary impacts. For example, the use of parts of the property for activities such as site compounds, should be avoided.

The State Party has ratified the *World Heritage Convention* and its Articles, and the Decisions of the World Heritage Committee are directly relevant to decision-makers within the State Party; therefore the findings and recommendations of this 2022 Advisory Mission report and the forthcoming Decision of the World Heritage Committee at its 45th session are directly relevant to consideration by the State Party authority for the re-determination of the Scheme’s Development Consent Order application.

Recommendations

1. In view of the Outstanding Universal Value (OUV) of the ‘Stonehenge, Avebury and Associated Sites’ property, and the iconic nature of the Stonehenge component (the WHS) in particular, if the A303 Amesbury to Berwick Down Road project (the Scheme) is approved and implemented the State Party should do all in its power to comply with Decisions of the World Heritage Committee.

2. While the Mission accepts that the Scheme to upgrade the A303 with the dual carriageway passing through the heart of the WHS with a tunnel, is the result of methodical and detailed analysis of options to respond to a complex set of demands and needs including those of the communities and villages around the WHS; nevertheless, in order to avoid adverse impacts on OUV, should the Scheme not proceed, the State Party should revisit alternative surface road options to consider whether one of them might be adapted to remove through traffic from the WHS, thereby minimizing adverse impacts on the OUV of the property, while also responding to the other complex demands and needs.
3. The proposed western portal of the current Scheme, and associated dual carriageway within a cutting, should not proceed without substantial amendment to avoid adverse impacts on the WHS and the OUV of the World Heritage property, to the fullest extent that is reasonably practicable.
4. If the Scheme proceeds, the underground section of the western approach (tunnel and/or cut-and-cover) should be extended, to at least to the western edge of the WHS boundary.
5. The western portal should be re-located as far to the west as reasonably practical, thereby reducing the length of the cut-and-cover section and minimising the extent of archaeological resources which must be removed.
6. There should be a comprehensive archaeological salvage and mitigation program, consistent with best practice standards and approaches; with methodology, extent, cost and timing determined based on expert advice about what is needed to achieve comprehensive archaeological salvage and mitigation.
7. In the event that unexpected archaeological finds were to occur during the course of the comprehensive archaeological salvage and mitigation program, provision should be made to stop work and evaluate options for improved conservation outcomes, including public communication of discoveries.
8. The proposed Longbarrow junction should be re-located further to the west, insofar as this is practically possible.
9. If the Scheme proceeds, a monitoring regime should be established to identify any changes to the water table which affect Blick Mead, and any such changes should be addressed through a process of adaptive management.
10. Appropriate community access, which is respectful of local interest groups, ownership and sensitivities, should be provided to Blick Mead, Vespasian's Camp, The Avenue and Amesbury Park, all of which should also be interpreted to enhance visitor experience of the WHS and its environs.
11. If the Scheme proceeds, the Scientific Committee should be requested and empowered to facilitate ongoing discussions and consideration of the most appropriate methods to achieve comprehensive archaeological salvage and mitigation.

12. The current representation on the HMAG should be augmented with addition of further expertise in cultural landscape conservation, management and interpretation.
13. If the Scheme proceeds, the rights of private farmers within the WHS should be pro-actively protected, including careful attention to new visitor opportunities and circulation patterns, and minimising ancillary impacts.
14. If the Scheme proceeds, the WHS should not be used for substantial temporary activities such as construction compounds, to the fullest extent practicable.
15. If the Scheme proceeds, all lighting arrangements for the tunnel and the surface of the WHS following the closure of the surface road of A303 should be carefully designed for safety as well as for enhancing the ‘night sky’, an important attribute of the Neolithic and Bronze-age funerary site.
16. Commercial signs should be prohibited within the WHS.
17. The State Party should ensure that this report is provided in a timely manner to all parties and individuals who may be involved in decision-making or implementation of the Scheme.
18. Revised plans for the Scheme, the rationale for specific changes, and details of the comprehensive archaeological salvage and mitigation program should be submitted to the World Heritage Centre, for review by the Advisory Bodies, prior to implementation, in accordance with paragraph 172 of the *Operational Guidelines for the Implementation of the World Heritage Convention*.
19. As a decision-maker within the State Party, which has ratified the World Heritage Convention, the responsible State Party authority should address obligations arising under the *World Heritage Convention* and Decisions of the Committee, in exercising the role of consent authority for the Scheme.
20. The responsible State Party authority should await the Decision of the World Heritage Committee at its 45th session before re-determining the Scheme’s Development Consent Order application.
21. The Development Consent Order should only be issued for the Scheme once the necessary funding to allow the Scheme to be modified in accordance with the Findings and Recommendations of this Mission report, has been identified and committed.
22. If the Development Consent Order is issued for the Scheme, it should subsequently be modified in accordance with the Findings and Recommendations of this Mission report, including provision for the underground section of the western approach to be extended, to at least the western edge of the WHS boundary.

1. Background and Context for the Mission

1.1 Justification

In December 2014, the UK Government announced that it would invest in a bored tunnel of at least 2.9km in length within the Stonehenge component of the World Heritage property ‘Stonehenge, Avebury and Associated Sites’ (WHS) to address the long-running traffic problems in a way that protects and provides benefits for the property. National Highways have developed a proposed scheme (the Scheme), which is being taken through a statutory public consultation process in the period February-April 2018.

In recognition of the need to protect the Outstanding Universal Value (OUV) of the WHS in addition to addressing the traffic issues, the Scheme has progressively been informed by Advisory missions, World Heritage Committee Decisions, and through engaging closely with Historic England, the National Trust, English Heritage Trust and Wiltshire Council Archaeology Service.

The current scheme has a long prior history, dating from 1994. Relevantly, Decision 27 COM 7B.82 of the World Heritage Committee “Welcomes the State Party’s decision to construct a bored tunnel, which is less damaging for the Stonehenge, Avebury and Associated Sites World Heritage property than a cut-and-cover tunnel”.

This fourth Advisory Mission, by experts from ICOMOS, ICCROM and the WHC builds on the advice and guidance previously provided by the WHC and ICOMOS in their technical reports arising from the initial Advisory Mission of October 2015, the follow up Advisory Missions of February 2017 and March 2018. These mission reports are available at [REDACTED]

This mission is also intended to assist the State Party of the United Kingdom of Great Britain and Northern Ireland (State Party) in responding to World Heritage Committee Decisions. For convenience, a summary of the findings and recommendations of the previous Advisory missions is provided as Annexure F and relevant extracts from World Heritage Committee Decisions between 2017 and 2020 (relating to the current scheme) are provided as Annexure G.

It is important to note that the Advisory Mission’s role is to provide advice and its remit does not include approving, refusing or endorsing any proposal, nor to speak authoritatively on behalf of ICOMOS/ICCROM/UNESCO, nor to pre-empt the official responses of these organisations, including the Decisions of World Heritage Committee.

1.2 Inscription History and Statement of Outstanding Universal Value

The World Heritage property ‘Stonehenge, Avebury and Associated Sites’ was inscribed on the World Heritage List in 1986. The WHS reflects the changing history of conservation and interpretation approaches as well as World Heritage criteria and procedures. The site spreads out over a very large area, mainly consisting of agricultural land, a vast hilly landscape punctuated with a few settlements, and a series of main roads, secondary roads and earth roads.

The complete Statement of Outstanding Universal Value of the property is provided in Annexure A. The summary section of the ‘brief synthesis’ reads:

The World Heritage property Stonehenge, Avebury and Associated Sites is internationally important for its complexes of outstanding prehistoric monuments.

Stonehenge is the most architecturally sophisticated prehistoric stone circle in the world, while Avebury is the largest. Together with inter-related monuments, and their associated landscapes, they demonstrate Neolithic and Bronze Age ceremonial and mortuary practices resulting from around 2000 years of continuous use and monument building between circa 3700 and 1600 BC. As such they represent a unique embodiment of our collective heritage.

The World Heritage property comprises two areas of Chalkland in southern Britain within which complexes of Neolithic and Bronze Age ceremonial and funerary monuments and associated sites were built. Each area contains a focal stone circle and henge and many other major monuments. At Stonehenge these include the Avenue, the Cursuses, Durrington Walls, Woodhenge, and the densest concentration of burial mounds in Britain. At Avebury they include Windmill Hill, the West Kennet Long Barrow, the Sanctuary, Silbury Hill, the West Kennet and Beckhampton Avenues, the West Kennet Palisaded Enclosures, and important barrows.

Stonehenge is one of the most impressive prehistoric megalithic monuments in the world on account of the sheer size of its megaliths, the sophistication of its concentric plan and architectural design, the shaping of the stones - uniquely using both Wiltshire Sarsen sandstone and Pembroke Bluestone - and the precision with which it was built.

At Avebury, the massive Henge, containing the largest prehistoric stone circle in the world, and Silbury Hill, the largest prehistoric mound in Europe, demonstrate the outstanding engineering skills which were used to create masterpieces of earthen and megalithic architecture.

There is an exceptional survival of prehistoric monuments and sites within the World Heritage property including settlements, burial grounds, and large constructions of earth and stone. Today, together with their settings, they form landscapes without parallel. These complexes would have been of major significance to those who created them, as is apparent by the huge investment of time and effort they represent. They provide an insight into the mortuary and ceremonial practices of the period, and are evidence of prehistoric technology, architecture and astronomy. The careful siting of monuments in relation to the landscape helps us to further understand the Neolithic and Bronze Age.

1.3 Terms of Reference

The purpose of the 2022 joint Advisory Mission to Stonehenge, Avebury and Associated Sites World Heritage property by the UNESCO World Heritage Centre, ICOMOS and ICCROM is to review the UK's progress on resolving the dual issues of upgrading the A303 road while also addressing its impact on the Stonehenge landscape; (an issue that has been an item of concern since the inscription of the property on the World Heritage List in 1986); and on addressing **Decision 44COM 7B.61** of the World Heritage Committee.

The UK State Party invited the Advisory Mission to assess progress on the A303 improvement scheme so that it delivers the best available outcome for the OUV of the property.

The main tasks of the 2022 Advisory Mission were to:

- Make a site visit to Stonehenge, Avebury and Associated Sites World Heritage property;

- Explore and evaluate the scheme and possible modifications under consideration since the World Heritage Committee Decision of 2021 and any further proposals to achieve design and delivery in the best way possible for the attributes which support the OUV and integrity of the property;
- Provide a succinct report, including advice to the State Party, which is consistent with the previous Decisions of the World Heritage Committee, and which focuses on current circumstances and opportunities to avoid impacts, or if unavoidable mitigate impacts on the OUV of the property.

The full Terms of Reference of the Mission are provided in Annexure B.

1.4 Mission Team

The Mission team comprised the following experts:

Dr Jyoti Hosagrahar, Deputy Director of the UNESCO World Heritage Centre

Dr Hosagrahar supports the programmes and management of the World Heritage Centre and leads the implementation of the 2011 UNESCO Recommendation on the Historic Urban Landscape, the World Heritage Cities Programme, the World Heritage Sustainable Development Policy, activities related to climate change and World Heritage, the World Heritage Fund as well as the development and implementation of Thematic Indicators for Culture in the Sustainable Development Goals across the Culture Sector.

Mr Joseph King, Senior Director, Office of the Director General, ICCROM

Mr. King provides support for the Director General in the implementation of the mandates of the organization, with a particular focus on governance issues. An architect and urban planner, he also leads a team of professionals in all aspects of ICCROM's role as an Advisory Body to the UNESCO World Heritage Convention, where he has represented ICCROM for 25 years at the World Heritage Committee.

Prof Richard Mackay, AM, ICOMOS World Heritage Adviser

Prof Mackay is a Director of Mackay Strategic Pty Ltd, Adjunct Professor at Deakin University Australia, former Chair of the Australian World Heritage Advisory Committee and ICOMOS World Heritage Adviser. His professional background is in archaeology, heritage management, cultural tourism and strategic planning for cultural heritage places.

A list of the personnel from the State Party who participated in the mission is provided in Annexure D.

A list of the members of civil society who met with the Mission (and the documents that they provided) is provided within the Mission programme at Annexure C.

1.5 Mission Programme

The Mission was undertaken between 19 and 21 April 2022. The Mission programme, updated by the State Party to reflect how the Mission actually proceeded is provided in Annexure C.

The Mission inspected the WHS, its setting and surrounding areas, in the company of representatives from the State Party, National Highways, Historic England, the English Heritage Trust, the National Trust, Wiltshire Council and (for part of the inspection) a potentially-affected property owner; received briefings from the project proponents, expert advisers and State Party authorities, met with the Parliamentary Under-Secretary of State for Sport, Tourism, Heritage and Civil Society,

the Parliamentary Under Secretary of State for Transport, representatives from civil society; and reviewed the briefing documents provided, in light of the findings and recommendations of the previous Advisory missions, recent decisions of the World Heritage Committee, and the findings of the Examining Authority. The Mission also engaged with a virtual reality interactive and immersive tool which enabled the viewer to explore the Stonehenge landscape from all vantage points, as it is and with the Scheme constructed, taking into account different seasons and conditions.

1.5 Documents Consulted

The Mission team was provided with a package of briefing documents on 4 April 2022. The core 'Mission Briefing Pack' document is provided in Annexure E.

The Mission reviewed a wide range of other documentation including (but not limited to):

State of Conservation Report by The State Party (in compliance with Paragraph 169 of the Operational Guidelines) Stonehenge, Avebury and Associated Sites, United Kingdom (373bis), February 2022.

Images (12) from the Virtual Reality Model issued by the State Party 5 April 2022;

Additional Images (12) from the Virtual Reality Model issued by the State Party 17 May 2022;

Presentation: Overview of managing change in World Heritage Sites in England, Duncan McCallum Strategy and Listing Director, Historic England, 19 April 2022;

Engineering Plan and Section Drawings of the Scheme, provided by the State Party;

National Highways letter: Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010 Re-determination of the Application 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 ("A303 Stonehenge Scheme") Statement of Matters issued 30 November 2021: Applicant's response cover letter dated 11 January 2022;

A303 Amesbury to Berwick Down Statement of Matters issued 30 November 2021: Applicant's response to the matters on which the Secretary of State invites further representations (Paragraph 2) Response to Bullet Point One – Alternatives Document reference: Redetermination-1.1 Planning Act 2008 The Infrastructure Planning (Examination Procedure) Rules 2010 January 2022;

A303 Amesbury to Berwick Down Statement of Matters issued 30 November 2021: Applicant's response to the matters on which the Secretary of State invites further representations (Paragraph 2) Response to Bullet Point Two – Policy Document reference: Redetermination-1.1 Planning Act 2008 The Infrastructure Planning (Examination Procedure) Rules 2010 January 2022;

A303 Amesbury to Berwick Down Statement of Matters issued 30 November 2021: Applicant's response to the matters on which the Secretary of State invites further representations (Paragraph 2) Response to Bullet Point Four – Environmental

Information Review Document reference: Redetermination-1.4 Planning Act 2008 The Infrastructure Planning (Examination Procedure) Rules 2010 January 2022;

A303 Amesbury to Berwick Down Statement of Matters issued 30 November 2021: Applicant's response to the matters on which the Secretary of State invites further representations (Paragraph 2) Response to Bullet Point Five – Any Other Matters. Document reference: Redetermination-1.5 Planning Act 2008 The Infrastructure Planning (Examination Procedure) Rules 2010 January 2022;

A303 Amesbury to Berwick Down TR010025 Environmental Statement Non-Technical Summary Volume 6.0 APFP Regulation 5(2) (a) Planning Act 2008 Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 October 2018;

A303 Amesbury to Berwick Down TR010025 7.1 Case for the Scheme and NPS Accordance APFP Regulation 5(2)(q) Planning Act 2008 Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 October 2018;

A303 Amesbury to Berwick Down, Examining Authority's Report of Findings and Conclusions and Recommendation to the Secretary of State for Transport and Appendices, The Planning Act 2008, 2 January, 2020.

A303 Amesbury to Berwick Down TR010025 Deadline 10 3.1 (8) Draft Development Consent Order APFP Regulation 5(2)(b) Planning Act 2008 The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, October 2019;

A303 Stonehenge TR010025: Historic England's (HBMCE) Concluding Submission, Application by Highways England for an Order Granting Development, 1 October 2019;

A303 Stonehenge TR010025: Amesbury to Berwick Down – Wiltshire Council Final Submission to Examination, 2 October 2019;

Stonehenge, Avebury and Associated Sites World Heritage Site Management Plan 2015 Part One: The Management Plan and the significance of the Stonehenge and Avebury World Heritage Site;

Stonehenge Land Ownership Map provided by the State Party;

HMAG Terms of Reference;

Scientific Committee Terms of Reference;

Letter to The World Heritage Centre from the Department for Digital, Culture, Media & Sport: 'Stonehenge, Avebury and Associated Sites' dated 30 May 2022; and

Clarification from the Department for Transport regarding modifications to the A303 Scheme through subsequent variations after the redetermination decision has been made, and if approval is given; received 31 May 2022.

The Mission also received and reviewed the following documents submitted by members of civil society:

Amesbury Museum & Heritage Trust letter and submission dated 20 April 2022;

Avebury Parish Council Written Representation: A303 Expressway at Stonehenge, and Response from Avebury Parish Council to Highways England's Comments on our Written Representation (Rep2-056);

Documentation provided by the Stonehenge Alliance, 20 April 2022, including:

- Links to key documents and extracts,
- Covering Note and Legal Submission concerning responses to Secretary of State's call for further representations on his Statement of Matters prior to redetermination of the A303 Stonehenge Scheme,
- Alternatives: response to Secretary of State's call for further representations on his Statement of Matters Bullet Point 1 prior to redetermination of the A303 Stonehenge Scheme (with glossary at end),
- Map of proposed A303 Stonehenge Scheme (courtesy Amesbury Museum & Heritage Trust);

A303 Amesbury to Berwick Down, Secretary of State's Re-determination of the Application for Development Consent, Representation by the Consortium of Stonehenge Experts, provided 19 April 2022;

Submission from Wiltshire Archaeological and natural History Society provided 20 April 2022;

Submission from the Druid Order provided 25 April 2022;

Submission from Stonehenge WHS Farmers provided 26 April 2022;

Statement by King Arthur Pendragon Titular Head and Chosen Chief Loyal Arthurian Warband, provided 20 April 2022;

Stonehenge, Avebury and Associated Sites World Heritage Site, Report for UNESCO WH Centre from The Stonehenge Alliance, March 2022; and

The Avebury Society: A303 Stonehenge DCO application: response to National Highways' further information requested by the Secretary of State for Transport, Ref 2001889.

2. Project Overview and Evaluation

2.1 National Highways Objectives

The main objectives of the A303 Amesbury to Berwick Down Road, as specified by the State Party (known as ‘client scheme requirements’), are:

- **Transport** – to create a high-quality route that resolves current and predicted traffic problems and contributes towards the creation of an Expressway between London and the South West;
- **Economic growth** – in combination with other schemes on the route, to enable growth in jobs and housing by providing a free flowing and reliable connection between the South East and the South West peninsula;
- **Cultural heritage** – to contribute to the conservation and enhancement of the World Heritage Site by improving access both within and to the site; and
- **Environment and community** – to contribute to the enhancement of the historic landscape within the WHS, to improve biodiversity along the route and to provide a positive legacy to communities adjoining the road.

2.2 Selection Process for the Preferred Route

Proposals to improve the A303 have been considered for approximately three decades. The 2018 Advisory Mission noted that:

Studies and consultation regarding options to improve the A303 have been underway since the early 1990s. In 1996, a 4km tunnel from King Barrow Ridge to Airman’s Corner was chosen by the Planning Conference, but was considered unaffordable and dropped in 1996. In the early 2000s, both cut and cover and bored tunnel options were considered, with a bored option new dual carriageway, along with a 2.1km-long bored tunnel, preferred, but ultimately cancelled.

The current project commenced in 2014 and through a staged process general corridors were identified as a precursor to specific route development and appraised in relation to the above client scheme requirements.

The first ICOMOS/UNESCO Advisory Mission took place from 27 to 30 October 2015, at the request of the State Party, following the announcement by the UK Government in 2014. At the time of the first mission, no precise plans existed regarding roads or tunnel portals, and the scheme was presented as a tunnel “at least 2.9 km long”. This notion was reached on the basis of potential portal placements suggested by English Heritage (now English Heritage and Historic England) and the National Trust. The Mission particularly advised regarding processes, and its report recommended further exploration of options.

The 2018 Advisory Mission report recognised that the State Party and its agencies were methodical and thorough in the approach to determining the preferred route and careful to have regard to the myriad of complex issues and pressures that affect both corridor and route selection and the assessment of potential benefits and costs. The 2018 Advisory Mission report provided a summary of the process used for route selection, which ultimately concluded that:

- surface routes within the WHS did not meet cultural heritage or environmental objectives;
- tunnel routes within the WHS met the objectives;
- surface routes outside the WHS to the north did not meet heritage, environment and community objectives; and

- surface routes outside the WHS to the south performed less well for transport and economy, environment and communities, but could have substantial benefits for the WHS.

Following more detailed consideration of the southern (F10) route, and longer tunnel options in particular, it was decided that the then preferred scheme was a tunnel generally through c2.9km of the property with a related surface carriageway and associated infrastructure. This scheme was modified following the 2018 Advisory Mission and Decision 44 COM 7B.61 of the World Heritage Committee, to become the Scheme that is the subject of the current Advisory Mission.

2.3 *The A303 and the Stonehenge Landscape*

The A303 existed on the site at the time of its inscription in 1986. Concern regarding the presence of the two lane major road had been noted at the time in the ICOMOS evaluation that recommended re-routing and restricting use to light vehicles only in the medium term.

The construction of major infrastructure such as roads and dams, in and around World Heritage properties, have been a concern to the World Heritage Committee owing to the significant negative impacts they have on the OUV of the property including its authenticity and integrity that may be structural, archaeological, visual, as well as in terms of drainage and vibrations. Where highways pass within property boundaries in the case of cultural World Heritage properties, they would generally be recommended for downgrading or restriction of heavy vehicular traffic. In the case of this component of the property, the matter is particularly sensitive as the existing road passes close to the iconic ensemble of Neolithic and Bronze age stones as well as a number of other important components of the landscape. From this perspective, removing all through traffic from the site would be ideal for the protection of the OUV of property. The World Heritage Committee at its 41st session in 2017, among other matters, had urged the State Party to explore further options with a view to minimizing negative impacts on the OUV of the property:

Urges the State Party to explore further options with a view to avoiding impacts on the OUV of the property, including:

- a) The F10 non-tunnel by-pass option to the south of the property,*
- b) Longer tunnel options to remove dual carriageway cuttings from the property and further detailed investigations regarding tunnel alignment and both east and west portal locations; (Decision 41 COM 7B.56)*

The 2015 and the 2018 Advisory Missions recognized that the State Party had explored alternatives to having the A303 pass through the property, including the F10 surface road passing to the south of the property, prior to arriving at the Scheme.

The 2018 Advisory Mission observed:

The Mission recognises that the State Party and its agencies have been methodical and thorough in the approach to determining the “Proposed Scheme” and have been careful to have regard to the myriad of complex issues and pressures that affect both corridor and route selection and the assessment of potential benefits and costs. The Mission recognises that the State Party and its agencies must seek to balance a range of issues and factors.

Further, following their inspection of the F10 route, the 2018 Advisory Mission concluded:

The Mission acknowledges that the State Party has determined that the F10 route will not proceed as it cannot deliver a key project objective. However, a surface route, which re-routes an improved A303 road completely around the WHS, and enables the

closure (or even downgrading) of the existing section of the A303 within the WHS, remains the best option in relation to impact on the OUV of the WHS. Therefore, it would be appropriate for potential surface routes for the proposed dual carriageway sections of the A303 to be reconsidered, on the basis that the OUV of the WHS should be given greater weight in the evaluation process and that any surface route must include closure of the section of the A303 which runs through the WHS.

The Mission again raised the question regarding the potential impacts on the Outstanding Universal Value (OUV) attributes of the property, arising particularly from impacts on the integrity and authenticity of the Neolithic and Bronze Age funerary landscape and hence the exploration of alternatives to the A303 passing through the very heart of the WHS and so close to key monuments. National Highways was emphatic that over the decades, all alternative routes and solutions to eliminate the movement of through traffic passing through the WHS had been systematically explored commencing with nearly 60 alternatives before arriving at the Scheme that is currently under consideration. Historic England, English Heritage Trust, the National Trust, Wiltshire Council, and HMAG concur with National Highways on this point.

The Mission accepts that the Scheme to upgrade the A303 with the dual carriageway passing through the heart of the WHS largely within a tunnel, has not been developed lightly simply to respond to transportation needs to the detriment of the OUV of the property. The Scheme is acknowledged to arise from methodical and detailed analysis of all options to respond to a complex set of demands and needs including those of the communities and villages around the WHS. Nevertheless, should the Scheme not proceed, whether through refusal of the DCO application, insufficient funding or other changed circumstances, the State Party should revisit alternative surface road options to consider whether one of them might be adapted to remove through traffic from the WHS completely, which would be the best option with regard to minimizing adverse impact to the OUV of the inscribed property, while also responding to other complex demands and needs. In this regard, the Mission notes that, notwithstanding the invitation provided in the ‘Statement of Matters’ issued on behalf of the Secretary of State for Transport dated 30 November 2021, and recent Decisions of the World Heritage Committee, no further consideration or analysis of alternatives has been offered by National Highways.

From the perspective that the objective of undertaking such a development project is to minimize any harm to the OUV of the inscribed property, the Mission considers that additional weight should be afforded to avoiding adverse impact on the inscribed property, in view of its ‘Outstanding Universal Value’ and the obligations of the State Party under the *World Heritage Convention*. The Mission considers that the appropriate ‘test’ is not whether there is a net benefit to OUV, but rather how any adverse impact on OUV can be avoided.

2.4 Public Consultation Process

Various phases of both statutory and non-statutory public consultation about the Scheme have occurred between 2017 and 2022, including initial briefings and exhibitions, a period of consultation about the then ‘Preferred Scheme’ as part of the obligatory statutory DCO process and an opportunity to make further representations in response to the Statement of Matters issued in November 2021 by the Secretary of State for Transport. Matters pertaining to World Heritage raised during this process and across the 2017 – 2021 period include:

- potential effects on the Outstanding Universal Value (OUV) attributes of the WHS, arising particularly from impacts on the integrity and authenticity of the Neolithic and Bronze Age funerary landscape;

- potential impact on Blick Mead, (including community access and groundwater changes);
- impact on the winter solstice alignment viewed from Stonehenge;
- damage to known and undiscovered buried archaeological features and deposits;
- archaeological methodologies and sampling strategies;
- impact on the nature reserve at Normanton Down; and
- effects arising from junction locations with the A360, including impacts on the setting of the Winterbourne Stoke Barrow Group.

Many other matters have been raised in public submissions and representations, including matters such as public or community access, amenity, traffic, and wider environmental impacts.

2.5 Changes following the 2018 Advisory Mission

The then scheme was modified following the 2018 joint World Heritage Centre/ICOMOS Advisory Mission. The following table, provided by the State Party (and included in the State Party's 2022 State of Conservation Report) summarises the changes that were made to the 2018 scheme before the DCO application was finalised and lodged.

Heritage Impact (Examples of Attributes affected)	2017 Preferred Route	2018 DCO Scheme (following 2018 World Heritage Centre/ICOMOS Advisory Mission)
<i>Severance of the Stonehenge Avenue (Attributes 1, 2, 6)</i>	<i>Reconnection of the Avenue to enhance its integrity</i>	<i>Confirmed reconnection of the Avenue including establishment of chalk grassland</i>
<i>Interruption of the midwinter solstice alignment (Attribute 4)</i>	<i>Western portal repositioned to remove severance of the midwinter solstice alignment caused by the current A303</i>	<i>Design refinements to avoid intrusion of highway infrastructure and traffic, and associated light pollution into the midwinter solstice alignment</i>
<i>Harmful impact within the setting of Winterbourne Stoke Crossroad Barrows, Diamond Group due to the existing Longbarrow junction (Attributes 2, 3, 5)</i>	<i>Relocation of the existing A360 road and the replacement Longbarrow roundabout 100m west</i>	<i>Relocation of the existing A360 road and the replacement of Longbarrow roundabout by a further 500m (to a total of 600m to the west, outside of WHS)</i>
<i>Visual & Aural Effects of Traffic on A303 (Attributes 3, 6, 7)</i>	<i>Existing A303 replaced with a restricted byway for use only by walkers, cyclists and horse riders, farm and emergency vehicles</i>	<i>Confirmed downgrading of existing A303 and approximately 1.25km of the A360 to restricted byways designed to integrate with chalk grassland and so reduce severance, providing the ability to explore the WHS and beyond</i>
<i>Visual & Aural Effects and Severance of Landscape (Attributes 3, 6, 7)</i>	<i>Bored tunnel at least 2.9km long</i>	<i>Tunnel length through the centre of WHS increased to 3.3km. Cutting design with shallow grass slopes and chalk grassland mitigation softens views of the cutting from heritage assets important to the understanding of the OUV, within the WHS</i>

<i>Ability to Explore the WHS and Experience the Relationships between Monuments (Attributes 3, 5, 6)</i>	<i>Reconnection of public rights of way currently severed by the A303</i>	<i>Removal of vehicular link between byways in vicinity of Normanton Down Barrow Asset Group, ensuring enhanced tranquillity of the WHS at this location</i>
<i>Loss of archaeological remains through excavation of the western and eastern cuttings (Attributes, 2, 6)</i>	<i>Western portal and approach cutting positioned through an area where the evidence from prior evaluation and survey demonstrates that the archaeological impacts can be effectively minimised</i>	<i>Detailed Archaeological Mitigation Strategy (DAMS) to ensure delivery of archaeological programme to the highest standards, commensurate with international importance of WHS</i>
<i>Severance between monuments (Attributes 2, 3, 5, 6)</i>	<i>Positions of tunnel portals optimised within the landscape</i> <i>Removal of severance from the King Barrow Ridge and associated barrow groups to the south</i>	<i>Road (and traffic on it) designed to be hidden within deep retained cuttings</i> <i>Inclusion of an extended 150m green land bridge towards the western end of the WHS, designed to reduce the visual severance between monuments and reinstate physical access between them</i>
<i>Restoring the character of the landscape without parallel (Attributes 2, 6)</i>	<i>Removal of current surface road infrastructure helping to eliminate physical intrusions in the landscape and improve the experience for users</i>	<i>Recreating chalk grassland habitat, delivering additional biodiversity and reducing the extent of agricultural cultivation within the WHS</i>
<i>Disturbance of dark skies (Attribute 4)</i>	<i>Subject to design for DCO</i>	<i>No lighting of eastern and western tunnel portals, or approaches, or on new Longbarrow junction</i> <i>Keeping lighting within WHS to absolute minimum needed for safety; achieving positive impact upon dark skies and appreciation of astronomical alignments</i>

Table 1 Elements incorporated into the Scheme following the 2018 Advisory Mission, to minimise negative effects and enhance positive effects on the attributes that convey the OUV of the WHS (extract from the State Party’s 2022 State of Conservation Report).

The Mission acknowledges the improvements made to the Scheme as modified following the 2018 joint World Heritage Centre/ICOMOS Advisory Mission. At the same time, the scientific understanding of the significance of the subterranean archaeological landscape in relation to its contribution to the OUV of the inscribed property has recently increased, as the result of new discoveries, made possible through emerging technology. This new information arguably warrants an expansion of the attributes which are currently recognised as supporting the OUV of the inscribed property.

In addition to other matters discussed below, and as raised in representations from civil society, the Mission considers that there should be a complete prohibition on commercial signs within the Stonehenge component of the property, and certainly none arising from implementation of the Scheme.

2.6 Proposed Scheme

The A303 Amesbury to Berwick Down Road project (the Scheme), which proposes to upgrade the existing A303 road that transects the Stonehenge component of the WHS, is part of a wider scheme for the A303/A358/A30 route to turn it into a continuous dual carriageway between the south-east and the south-west of England. In March 2020 £1.7 billion was allocated by the UK Government towards implementing the Scheme. The proposal specifically considered by the Mission includes the following components:

- Relocating 3.3km of the existing A303 surface road through the property within a tunnel;
- Setting the new road in the western part of the property in a deep retained cutting, incorporating a 150m wide land bridge;
- Setting the approach to the eastern portal in a cutting connecting to the existing surface dual carriageway,
- Redundant carriageway largely restored to grass,
- Reuniting the Stonehenge Avenue that is severed by the current A303;
- Replacing the existing Longbarrow roundabout with a new A360 junction, relocated 600m west of the WHS property, removing road infrastructure from the immediate proximity of key barrow groups;
- Upgrading the Countess junction with the A345 on the eastern edge of the WHS property to provide a new flyover; and
- 17km of new and upgraded rights of way both within and in the vicinity of the property to improve connectivity and accessibility for pedestrians, cyclists and horse riders.

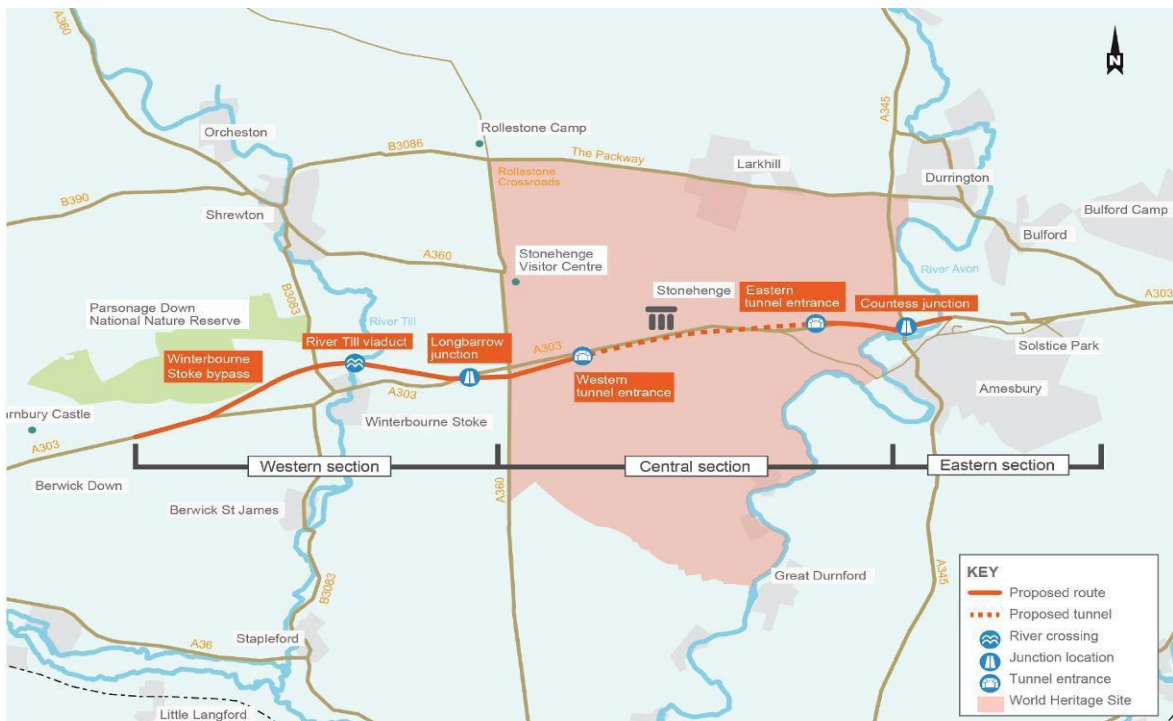


Figure 1: A303 Stonehenge Amesbury to Berwick Down (Source: Adapted from A303 Amesbury to Berwick Down TR010025 Environmental Statement Non-Technical Summary Volume 6.0 APFP Regulation 5(2)(a) Planning Act 2008 Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 October 2018, page 7).

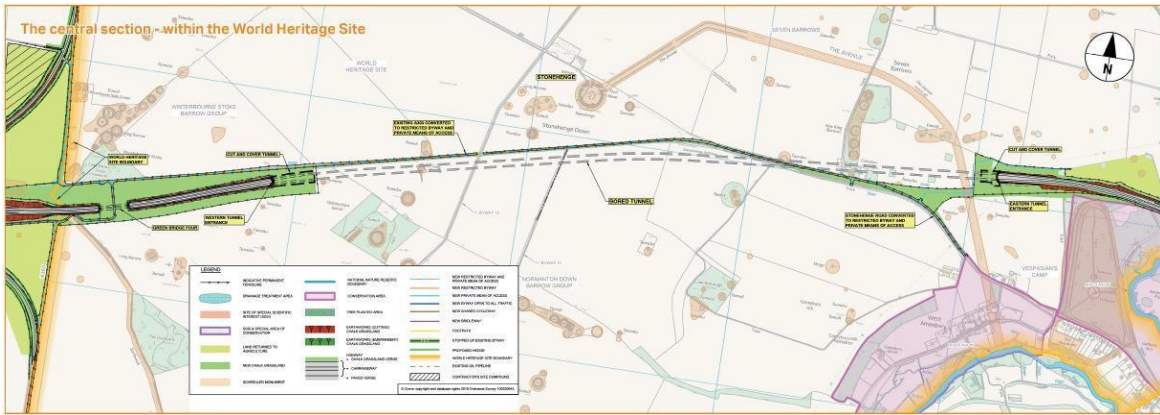


Figure 2: Central section of the Scheme, showing major above-ground features of the Stonehenge landscape. (Source: A303 Amesbury to Berwick Down TR010025 Environmental Statement Non-Technical Summary Volume 6.0 APFP Regulation 5(2)(a) Planning Act 2008 Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 October 2018, pages 20 & 21).

The Mission considers that if the upgraded A303 is to run through the WHS at least in part beneath the surface, the proposed alignment is appropriate because it has been adjusted to avoid potential conflict with Normanton Barrows and the Stonehenge solstice alignment, moved away from the Winterbourne Stoke Barrow Group and informed by an extensive program of archaeological evaluation. However, the Mission has serious concerns with the proposed western portal and associated dual carriageway within the WHS, including the residual impact on the setting of the Winterbourne Stoke Barrow Group (as outlined below) as well as the impact of the cut and cover proposal on the archaeological attributes of the inscribed property. The Mission considers that a route, which re-routes the A303 completely around the Stonehenge component of the WHS, and enables the closure of the existing section of the A303 within the WHS, as recommended in the 2018 Advisory Mission, would still provide the best option in relation to impact on the OUV of the property and that route selection should be further considered, particularly in the event that the current Scheme does not proceed.

2.7 Eastern Portal and Approaches

The Scheme proposes major re-configuration of the Countess Roundabout, with a dual carriageway flyover across the roundabout itself, continuing westward into the WHS, within and above the existing road reservation, before diverting to the north-northwest into the proposed eastern portal, which would be entered through a short cut and cover section. The distance between the eastern edge of the WHS and the eastern portal would be approximately 1.3km. The eastern portal would be located downhill, to the east of The Avenue, enabling its re-unification and potential traversal on foot. The use of the existing road reservation reduces the additional road footprint required. Approximately two-thirds of the new road construction in this area would occur within the existing highway boundaries. This location and alignment also avoid both Blick Mead and Vespasian's Camp. However, placing the portal in this location would require retention of much of the existing road reservation, plus new flyover, cutting, portal and tunnel infrastructure, total removal of subterranean archaeological features, and approximately 1.3km of new dual carriageway within the WHS (part of it replacing a section of the existing dual carriage highway).



Figure 3: Proposed eastern portal site, looking east. Vespasian's Camp is the wooded ridge to the right. The existing A303 is also visible to the right (red vehicle). The heavy red line shows the approximate portal location. (Photo: Richard Mackay 2022).



Figure 4: Existing A303 looking southwest from an area uphill and west from the proposed eastern portal site. This section of the extant road would be removed and re-grassed, allowing connections between severed sections of The Avenue, nearby. (Photo: Richard Mackay 2022).

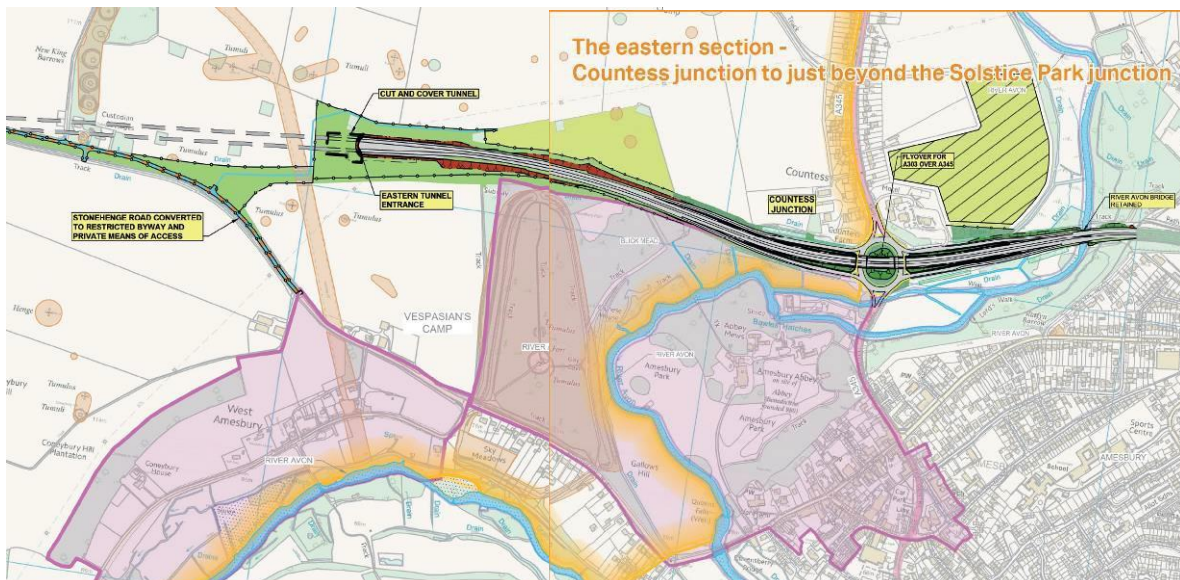


Figure 5: Composite plan showing proposed Countess junction, new flyover, and eastern portal, in relation to tumuli, The Avenue (pale peach colour), Vespasian's Camp and Blick Mead. (Adapted from: A303 Amesbury to Berwick Down TR010025 Environmental Statement Non-Technical Summary Volume 6.0 APFP Regulation 5(2)(a) Planning Act 2008 Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 October 2018, pages 20-23).

The Mission consciously re-visited and re-inspected the eastern portal site and associated proposed infrastructure arrangements and monuments and sites in the vicinity. The Mission was mindful that some significant archaeological discoveries have been made within the WHS since 2018, as the result of emerging technologies, but that these do not occur in the area that is directly affected by the proposed eastern portal. The Mission concurs with the 2018 Advisory Mission that, if a tunnel were to be constructed, the eastern portal has been positioned in the least impactful location available which is sufficiently close to the WHS boundary, given the constraints imposed by the attributes of the WHS, other significant sites in the vicinity (including Vespasian's Camp and Blick Mead) and local topographic and environmental conditions. The location of the eastern portal to the east of The Avenue is an improvement on previous options, although the proposed dual carriageway would still be visible from, and therefore adversely affect, the visual setting of The Avenue and would require removal of archaeological features, thereby adversely affecting the overall integrity of the WHS.

The Mission considers that although the potential for changes to the water table which affect Blick Mead are low, it would be appropriate to instigate a monitoring regime with associated adaptive management provisions, in the event that the Blick Mead site were to be affected. The Mission also considers that the proponent of the Scheme and WHS site manager should pursue appropriate arrangements for community access to and interpretation of Blick Mead, Vespasian's Camp, The Avenue and Amesbury Park, as part of the implementation of the Scheme.

2.8 Western Portal and Approaches

The western portal and approaches are proposed to be south of the existing A303, with the portal emerging from the west facing slope of a shallow dry valley, approximately 1km east of the western boundary of the WHS, as indicated in Figure 2 above. Between the portal and the new Longbarrow Junction (approximately 600m to the west of the WHS), the new dual carriageway would run through a deep cutting (c8m). The proposed scheme uses chamfered grass slopes with a vertical wall below, on either side of the dual carriageway road, to reduce visibility from the surrounding landscape. The approximate location of the western portal is shown in Figure 6 below. Figure 7 shows the view looking eastward from proposed 'Land Bridge 4', towards the proposed western portal. Current and projected visualisations, showing the perspective looking east along the alignment of the current A303, are provided in Figures 10 and 11 below.



Figure 6: View looking south across the line of the proposed new road, beyond the western tunnel portal (red arrow) / cutting, towards the Lake Barrow cemetery in the distance with the western portal (indicatively indicated by red arrow).

(Photo: Richard Mackay 2022).



Figure 7: View from the eastern edge of the middle of the proposed 'Land Bridge 4', looking eastward down the middle of the proposed A303 at the proposed Western Portal. (Provided by the State Party: slide 3 of the fixed image set from the supplementary virtual reality model slide set, provided in May 2022).

The Scheme for the western approaches includes a 150m wide land bridge (Land Bridge 4) across the dual carriageway, approximately 300m east of the western boundary of the WHS, located to provide an outlook to and from the Winterbourne Stoke Group. Figure 8 provides an indicative visualisation of this land bridge. The Mission was advised that that Land Bridge 4 cannot be made wider than 150m, without becoming classified a 'tunnel', which would require considerable additional infrastructure.



Figure 8: General example of a green bridge, as proposed for Land Bridge 4. (Source: A303 Amesbury to Berwick Down TR010025 Environmental Statement Non-Technical Summary Volume 6.0 APFP Regulation 5(2)(a) Planning Act 2008 Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 October 2018, page 6).

The Mission considers that the proposed western portal and associated dual carriageway, within a cutting, would have an unacceptable and inappropriate adverse impact on the setting of the Winterbourne Stoke Barrow Group and the physical and visual integrity of the WHS and the Scheme should not proceed without substantial amendment to avoid this impact. The Mission notes that proposed western portal and associated dual carriageway, within a cutting, would also

have a substantial adverse impact on the archaeological resources which would be excavated. The impact on archaeological resources is addressed further below.



Figure 9: View towards the Winterbourne Stoke Barrow Group, looking generally north from the southern part of the WHS, through the area proposed for Green Bridge 4 – which is indicatively marked by the red arrows. (Photo: Richard Mackay 2022).

The Mission notes that the State Party has advised that following a proposed ‘setting study’, and having regard to advancements in excavations, research, and understanding of the WHS since its inscription, the boundaries of the property may be revised. The western boundary of the property near the present Longbarrow Junction is one area where some boundary modification may be considered. Hence, this part of the WHS is particularly significant to the attributes which support the OUV of the property.

The Mission considers that if the Scheme proceeds, the minimum change required, in light of the above considerations, would be an extension of the underground section of the western approach (in tunnel or cut-and-cover) at least to the current western edge of the WHS boundary. The western portal should be re-located as far to the west as reasonably practical, thereby reducing the length of the cut-and-cover section and minimising the extent of archaeological resources which must be removed.



Figure 10: Screenshot from the virtual reality model, showing the existing view from the western end of the WHS looking east along the current A303. (Provided by the State Party: slide 11 of the fixed image set from virtual reality model slide set).



Figure 11: Screenshot from the virtual reality model, showing the proposed view from the western end of the WHS looking east along the decommissioned A303. (Provided by the State Party: slide 12 of the fixed image set from virtual reality model slide set).

2.9 Longbarrow Junction and Roundabout

The Scheme would involve the re-location of the Longbarrow junction and Roundabout approximately 600m to the west, outside the western boundary of the WHS, as shown in Figure 12 below. This would provide a significant improvement to the visual and physical setting of the Winterbourne Stoke Group, as shown in Figures 13 and 14 below. In particular the re-location of the roundabout and re-grassing of the remediated area would improve the setting of the adjacent Long Barrow, as illustrated in Figure 14.

The Mission considers that the proposed re-location of the Longbarrow junction between the A303 and the A360 outside the property, some 600m to the west would benefit the setting of the Winterbourne Stoke Group and improve the visual setting of the WHS; but moving the proposed Longbarrow junction even further to the west would increase these benefits – particularly in view of the significance of the archaeology and the interconnections between the southern and northern sections of the barrows in this specific part of the WHS as noted above.

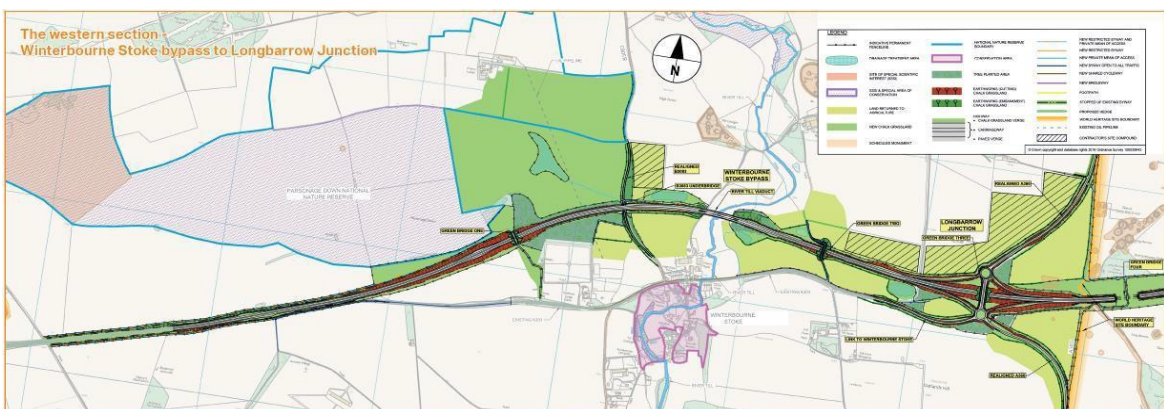


Figure 12: The proposed re-location of the Longbarrow junction and roundabout approximately 600m to the west of the property boundary, including associated links to the A360. (Source: A303 Amesbury to Berwick Down TR010025 Environmental Statement Non-Technical Summary Volume 6.0 APFP Regulation 5(2)(a) Planning Act 2008 Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 October 2018, pages 18 &19).



Figure 13: The Long Barrow at the southwestern end of the Winterbourne Stoke group, looking south west across the existing Longbarrow junction and roundabout. (Photo: Richard Mackay 2022).



Figure 14: Screenshot from the virtual reality model, showing the view from the southern edge of the Winterbourne Stoke Barrow group within the WHS looking southwest towards the previous location of the Longbarrow junction. (Provided by the State Party: slide 14 of the fixed image set from virtual reality model slide set).

2.10 The Tunnel

The Scheme includes a 3.3km section of bored plus cut-and-cover tunnel, generally along the alignment shown in Figure 2 above. The tunnel would remove the road from the central part of the WHS, but the construction of dual carriageway in cuttings at either end of the tunnel would adversely and irreversibly impact on the integrity of the WHS and the OUV of the inscribed property, through removal of archaeological features and deposits, through disrupting the spatial and visual links between monuments, and as a result of its overall visual impact.

The Mission notes that the State Party and its agencies have responded to the recommendations of previous Advisory Missions and Decisions of the World Heritage Committee and made changes to the Scheme. However, the major concern expressed by the 2018 Advisory Mission and in World Heritage Committee Decision 44 COM 7B.61 remains, namely that the Scheme (particularly at the western end) would: “*impact adversely the Outstanding Universal Value (OUV) of the property, especially affecting its integrity*” and that: “*the scheme should be modified to deliver the best available outcome for the OUV of the property*”.

Extending the proposed tunnel to the west, beyond the boundary of the WHS would enable greater re-connection between the southern and northern sections, an improved setting for the Winterbourne Stoke Group and reduce impacts on archaeological resources within the WHS and on its integrity. However, it is recognised that a longer tunnel would be challenging in view of topographic considerations and design options, and may involve moving the Longbarrow junction back towards the western edge of the WHS.

2.11 *Landscape Integrity*

According to Paragraph 47 of the *Operational Guidelines*, the definition of a cultural landscape is a “combined works of nature and of man” designated in Article 1 of the Convention. They are illustrative of the evolution of human society and settlement over time, under the influence of the physical constraints and/or opportunities presented by their natural environment and of successive social, economic and cultural forces, both external and internal. The Stonehenge landscape was inscribed on the World Heritage List in 1986, a full 6 years prior to the concept of cultural landscape being introduced into the *World Heritage Convention*. Yet, the Statement of Outstanding Universal Value (SOUV) for the property does recognize the property as a landscape, stating, “Together with inter-related monuments, and their associated landscapes, they demonstrate Neolithic and Bronze Age ceremonial and mortuary practices resulting from around 2000 years of continuous use and monument building between circa 3700 and 1600 BC. As such they represent a unique embodiment of our collective heritage.” Further in the SOUV, it states, “There is an exceptional survival of prehistoric monuments and sites within the World Heritage property including settlements, burial grounds, and large constructions of earth and stone. Today, together with their settings, they form landscapes without parallel.”

The Mission points this out, not to imply that the property was inscribed as a cultural landscape under the *Operational Guidelines* amended in 1992, but rather to clarify that as stated in the SOUV, the property needs to be understood as an incomparable cultural landscape and that its safeguarding and protection should have a landscape approach¹. The landscape approach is important when considering the integrity of the property. The *Operational Guidelines* define integrity as, “a measure of the wholeness and intactness of the natural and/or cultural heritage and its attributes”. The Mission considers that this issue of wholeness and intactness goes to the centre of the evaluation of the Scheme.

The WHS consists of the main henge monument in the centre of an open archaeological landscape of visually and spatially interlinked monuments. A non-exhaustive list of some of this heritage within the landscape include Durrington Walls, Woodhenge, the Cuckoo Stone and Vespasian’s Camp to the eastern side of the WHS, the Avenue, Wilsford Barrow Group, Normanton Down Barrow Group, the Stonehenge Cursus and Cursus Barrow Group in the central part of the property, and the Winterbourne Stoke Crossroads Barrow Group, and the Lake Barrow Group to the western side.

The relationship between these components in the Neolithic and Bronze age funerary landscape is important from many aspects, not just visual, but also structural and functional. In effect, in order for the condition of integrity to be met, there is a need for the property to be understood as whole or intact, not just from a visual perspective, but also from a structural and functional perspective, including both surface and sub-surface features.

¹ This can be considered as similar to the more recent Historic Urban Landscape (HUL) approach. Urban areas are not inscribed as Historic Urban Landscapes, but States Parties are often asked to ensure their protection using the HUL approach.

Currently, the two-lane surface highway A303 cuts across this landscape from east to west for approximately 5km. It can be argued that in its current form with the A303 running through the WHS, there is already a significant impact on the integrity of the property, which was already present at the time of inscription. The Mission therefore agrees with the State Party that removal of the surface highway A303 from the central part of this landscape near the Stonehenge Down Barrow Group could bring positive benefits. The tunnel through the central part of the WHS could restore, visual and functional integrity to this part of the WHS.



Figure 15: Visualisation of the re-connected Stonehenge landscape in the vicinity of the Stonehenge Monument, looking generally east towards the King Barrow Group and Avon River. (Source: A303 Amesbury to Berwick Down TR010025 Environmental Statement Non-Technical Summary Volume 6.0 APFP Regulation 5(2)(a) Planning Act 2008 Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 October 2018, page 2).

The question then remaining relates to the impacts of the proposed significant cuts into the landscape at the eastern and western ends of the property on the integrity of the property. While the State Party has tried to minimize the visual impacts of the scheme, the deep open cutting along approximately 2km (both on the eastern and western sides) would have a negative impact on the integrity of the property, and the physical impact arises – irrespective of visibility.

The ability to perceive and understand the landscape as a whole and the relationships between the various elements is significantly challenged with the open cuts at both ends. Those open cuts will always present a problem in understanding the property as being whole and intact, not just visually, but also functionally and, in the larger sense, conceptually.

On the western side the 200m grass canopy and the 150m green bridge are meant to return at least a measure of integrity to the western portal. But, given the geography and topography of that side of the property and the fact that the views are open between elements, these attempts are considered by the Mission to be too little in restoring integrity. A better option would be to create full coverage at ground level once the road exits from the bored tunnel until at least the edge of the property, but this would still have impacts on subterranean archaeological features.

On the eastern side, the issue of integrity is also present, but given the limited solutions possible owing to the geography and topography on the eastern side, and the visual organization of the heritage, the Mission found that the visual disturbance to the integrity would be somewhat less.

With this in mind, the Mission considers that on the eastern side, that the cutting and the flyover offer the best practical solution for the safeguarding of the OUV of the property, while on the western side, rather than the proposed green land bridge, the underground carriageway should extend all the way to the edge of the property. Ideally, this should be achieved by maximising the length of the tunnel itself, locating the western portal as far to the west as reasonably practical, and minimising the amount of cut and cover, thereby also minimising removal of subterranean archaeological features.

The Mission also considers that in light of landscape considerations outlined above, the project would benefit from access to additional expertise in cultural landscape conservation, management and interpretation.

2.12 Archaeological Resource Management

The archaeological features of the WHS are important attributes of the inscribed property that contribute to its intactness and wholeness, and thereby to its integrity. Recognising that if the Scheme proceeds, large sections of subterranean archaeological features and deposits will be removed, the Mission considers that the extent of such removal should be minimised to the fullest extent that is reasonably practical. At the western end, this would mean either tunnelling beyond the western boundary of the WHS or moving the western portal as far to the west as possible, thereby reducing the extent of cut-and-cover required to reach the western boundary of the WHS.

The Mission further considers that in view of the proposed removal of archaeological features and deposits from what is one of the world's great archaeological landscapes, and the contribution of these elements to the integrity and OUV of the property, there should be a comprehensive archaeological salvage and mitigation program, consistent with best practice standards and approaches. The methodology, extent, cost and timing of this program should be determined based on expert advice about what is needed to achieve comprehensive archaeological salvage and mitigation.

In the event that unexpected archaeological finds were to occur during the course of the comprehensive archaeological salvage and mitigation program, provision should be made to stop work and evaluate options for improved conservation outcomes, including public communication of discoveries.

2.13 Heritage Monitoring and Advisory Group (HMAG)

The Heritage Monitoring and Advisory Group (HMAG) was convened, in accordance with a recommendation from the 2015 Advisory mission, to advise National Highways. It comprises representatives from:

- Historic England (UK Government's statutory heritage advisor);
- Wiltshire Council Archaeology Service (WCAS – statutory heritage advisor on behalf of the local planning authority);
- English Heritage Trust – operators of the Stonehenge site and Visitor Centre and guardians of the monument on behalf of Historic England; and
- The National Trust for England and Wales – public membership body owner and manager of extensive estate in the WHS.

The Mission notes that HMAG provides pro-active heritage advice by engaging directly with the designers to influence design decisions, and by setting and monitoring archaeological requirements and standards of work within the WHS. The Mission did not meet separately with

HMAG, but the members of HMAG participated in the Mission programme and provided an account of the HMAG role and operations.

The Mission concurs with the findings of the 2018 Advisory Mission that the Heritage Monitoring and Advisory Group, in combination with the Scientific Committee, provides an appropriate heritage-centred steering mechanism for future stages of decision making and project implementation.

However, the Mission also considers that the representation within the HMAG would benefit from augmentation with addition of expertise in cultural landscape conservation, management and interpretation.

2.14 Scientific Committee

The Scientific Committee was established in late 2017 and provides advice through regular meetings and through technical papers authored by members. It reviews and comments on archaeological proposals arising from the Scheme. The Scientific Committee minutes are publicly available through its dedicated website at: [h \[REDACTED\]](#)

The Scientific Committee includes members of HMAG, representatives from the National Trust and Wiltshire Council, plus other leading experts, covering disciplines such as the archaeology of the WHS, relevant archaeological periods, archaeological science, archaeoastronomy, geoarchaeology, palaeoenvironmental archaeology, landscape archaeology, geophysical survey and remote sensing, and archaeology in major infrastructure projects. Archaeological work is undertaken by Wessex Archaeology.

The 2018 Advisory Mission recommended that the Scientific Committee should be empowered to provide unfettered advice on any matter, including alternative route or construction options and the archaeological methodologies to be used in implementing the *Archaeological Evaluation Strategy* and the *Overarching Written Scheme of Investigation for Archaeological Evaluation*, and that to give effect to its independent expert status, the Scientific Committee should be at liberty to report directly to the Heritage Monitoring and Advisory Group and/or to the UK statutory heritage bodies.

The Mission met with seven members of the Scientific Committee and heard from them in relation to archaeological approaches, methods, recent discoveries and sampling and salvage and mitigation strategies. The Mission notes that the archaeological investigations and testing undertaken to date have revealed (inter alia) a beaker period site/deposit at the western end of the WHS and various other features. Diverse opinions were expressed, especially in relation to topsoil sampling, analysis and recovery; a situation which the Mission regards as healthy of itself and evidence that the experts on the Scientific Committee are indeed unfettered in articulating their opinions and advice.

The Mission considers that ongoing specialist input to all archaeological processes should continue to be provided by the Scientific Committee, but that in light of the diverse opinions expressed by the Scientific Committee on matters such as sampling and recovery, it would be appropriate to facilitate ongoing discussions and consideration of the most appropriate methods to achieve comprehensive archaeological salvage and mitigation.

2.15 Civil Society

The Mission met with representatives of the following sectors from civil society:

- The Stonehenge Alliance;
- Museums: Amesbury Museum and Wiltshire Museum;
- Druids;
- Affected property owners; and
- Local residents.

During these meetings and in reviewing documents subsequently submitted by some of these parties, the Mission was advised of the great diversity in opinions and concerns, ranging between complete objection to the Scheme, urgency of its implementation, preference for routes to the north and south of the WHS and a variety of contentions regarding the proposed tunnel. Affected property owners particularly highlighted potential impacts and concerns related to additional visitation across the WHS landscape and temporary use of their lands for construction purposes. Concerns were also expressed about the need for ongoing community engagement, appropriate access arrangements and protection of adjacent sites, including Blick Mead and Vespasian's Camp.

The Mission considers that if the Scheme proceeds, the rights of private farmers within the WHS should be pro-actively protected, including careful attention to new visitor opportunities and circulation patterns, and minimising ancillary impacts. For example, the use of parts of the property for activities such as site compounds, should be avoided. The Mission also considers that although the potential for changes to the water table which affect Blick Mead are low, it would be appropriate to instigate a monitoring regime and to manage any identified effects. The Mission notes the need for appropriate community access to, and interpretation of, Blick Mead, Vespasian's Camp, The Avenue and Amesbury Park, so as to enhance visitor experience of the property and its environs.

2.16 Legacy Benefits

The State Party proposes a range of 'legacy' benefits, which extend beyond the construction of the dual carriageway and removal of the surface road through the centre of the WHS, including:

- **Heritage:** Reconnecting the World Heritage Site, helping to protect and enhance its unique value and improving understanding of our ancient heritage.
- **Environment:** Caring for, protecting and enhancing the environment and helping people connect with nature.
- **Community:** Listening, engaging and being an active part of community, seeking ways to maximise the benefits of the scheme.
- **Economy:** Boosting the economy of the South West and creating new opportunities for tourism, both locally and further afield.
- **Transport:** Providing a safe and efficient link between the South East and South West, making local and long-distance journeys quicker, more reliable and less stressful.

The Mission did not engage in any detail with the 'legacy benefits' package itself, but notes that this was addressed by the 2018 Advisory Mission.

2.17 National Highways Response to World Heritage Committee Decision 44 COM 7.B.61

National Highways has responded to the Statement of Matters issued on 30 November 2021 by the Secretary of State for Transport, including document: 'Redetermination-1.5', which provides a response to bullet point 5 of the Secretary's Statement seeking representations on:

a ny other matters arising since 12 November 2020 which Interested Parties consider are material for the Secretary of State to take into account in his redetermination of the application.

This response to bullet point 5 includes (*inter alia*) the following statements regarding the view of the World Heritage Committee and its use of the term “best available outcome”:

1.2.6 In relation to the weight that should be placed on the WHC’s view, the Applicant’s position remains as stated in its closing submissions [TR010025-001775-8.70, AS-146, paragraph 2.3.11], that the WHC is not a decision-making body set up to determine whether developments around the world are acceptable or not. Consequently, the views of the WHC should be treated as the views of a consultee, to be given appropriate weight by a decision maker. Any approach which treats the views of the WHC as determinative would be legally flawed and should be rejected.

1.2.11 The conclusions by the WHC in relation to the longer tunnel and its view that the scheme should “deliver the best available outcome” were considered and addressed in the Applicant’s closing submission [AS-146] at para 2.3.8 – 2.3.10 – those submissions remain applicable to the WHC’s decision at its 44th session:

2.3.8 The “Analysis and Conclusions of the World Heritage Centre, ICOMOS and ICCROM” suggests further consideration of a longer tunnel to the west should be undertaken, stating that the “justification [for the Scheme is] based on assessing whether the proposal is an improvement, rather than the best available outcome for the OUV of the property”.

2.3.9 The Applicant, as was explained at ISH8, considers that the objective of achieving the best available outcome does not reflect either the obligations contained within the World Heritage Convention to protect and conserve the WHS or the approach set out in relevant ICOMOS published guidance.

2.3.10 The phrase “best available outcome” is not language that comes from the World Heritage Convention. It cannot be found within the NPSNN either. Indeed, it does not reflect the approach set out in ICOMOS’s own guidance (i.e., that of taking an overall view of OUV once benefits and harm have been assessed).

(Above extracts from: A303 Amesbury to Berwick Down Statement of Matters issued 30 November 2021: Applicant’s response to the matters on which the Secretary of State invites further representations (Paragraph 2) Response to Bullet Point Five – Any Other Matters. Document reference: Redetermination-1.5 pages, 5,6,7).

The Mission notes the above responses with concern. The Mission notes that the World Heritage Committee does not purport to be a ‘decision-making body’ as implied in paragraph 1.2.6 above, but that the Committee has been established under the *World Heritage Convention* – to which the United Kingdom of Great Britain and Northern Ireland is a State Party. The Mission notes that the State Party has ratified the Convention and that therefore its Articles and the Decisions of the Committee are directly relevant to the consideration of the DCO by the Secretary of State for Transport. As a decision-maker within the State Party, the Secretary of State for Transport should address the requirements of the Convention, in exercising the role of consent authority.

Articles 4 and 5 of the *World Heritage Convention* include (*inter alia*) some highly relevant provisions as follows:

Article 4

Each State Party to this Convention recognizes that the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage referred to in Articles 1 and 2 and situated on its territory, belongs primarily to that State. It will do all it can to this end, to the utmost of its own resources and, where appropriate, with any international assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain.

Article 5

To ensure that effective and active measures are taken for the protection, conservation and presentation of the cultural and natural heritage situated on its territory, each State Party to this Convention shall endeavor, in so far as possible, and as appropriate for each country:

(a) to adopt a general policy which aims to give the cultural and natural heritage a function in the life of the community and to integrate the protection of that heritage into comprehensive planning programmes;

(b) to set up within its territories, where such services do not exist, one or more services for the protection, conservation and presentation of the cultural and natural heritage with an appropriate staff and possessing the means to discharge their functions;

. . .

(d) to take the appropriate legal, scientific, technical, administrative and financial measures necessary for the identification, protection, conservation, presentation and rehabilitation of this heritage . . .

The Mission notes that Article 4 imposes a ‘conservation’ obligation to seek transmission of cultural heritage to future generations. Each signatory State Party has committed and is expected to do: *all it can to this end, to the utmost of its own resources* . The Mission considers that in the circumstances of the Scheme, compliance with these obligations extends to the World Heritage Committee request that the Scheme: “*should be modified to deliver the best available outcome for the OUV of the property*” (Decision 44 COM 7B.61).

Furthermore, The Mission notes that Article 5 includes (*inter alia*) matters such as integrating heritage protection into comprehensive planning programmes, establishment of services for conservation, and rehabilitation. The Mission considers that the Scheme provides an important one-off opportunity for ‘rehabilitation’ as sought by Article 5. In view of the iconic status of the WHS, it is appropriate that the current opportunity be taken to achieve rehabilitation to the fullest extent that is reasonably practicable.

The Mission considers that, in the circumstances, delivering the ‘best available outcome’ remains appropriate and does not accept the assertion that such words would need to be in the *World Heritage Convention*, its *Operational Guidelines* or associated ICOMOS Guidance in order to be applicable to the Scheme.

3. Findings and Recommendations

3.1 Response to Terms of Reference

In addition to the ‘Key Findings’ and ‘Recommendations’ below, the Mission also presents the following short responses to the Terms of Reference:

Make a site visit to Stonehenge, Avebury and Associated Sites World Heritage property

The Mission was undertaken between 19 and 21 April 2022 and included two extensive visits to the Stonehenge component of the Stonehenge, Avebury and Associated Sites World Heritage property. These visits enabled a ‘first hand’ understanding of the WHS, and the proposed elements of the Scheme.

Explore and evaluate the scheme and possible modifications under consideration since the World Heritage Committee Decision of 2021 and any further proposals to achieve design and delivery in the best way possible for the attributes which support the OUV and integrity of the property

The Mission was framed by the Terms of Reference. The Mission was briefed about the Scheme by representatives of National Highways, The English Heritage Trust, The National Trust, Historic England, Wiltshire Council, and carefully reviewed the briefing material provided by the State Party, including documents setting out:

- *A clear indication of the ‘A303 improvement scheme’ which is currently under consideration;*
- *A short written description (or schedule) of any changes made to the A303 improvement scheme since previous consideration by the World Heritage Committee;*
- *Plans, visualisations, presentations and other documents which illustrate the current scheme and any such changes;*
- *An indication of modifications that are under consideration or have been considered since the High Court decision; and*
- *Advice provided by Historic England, technical advisers or other relevant representations on the current A303 improvement scheme.*

The Mission also carefully considered a range of additional documents including further information provided by the State Party in response to queries, direct submissions from civil society and submissions made in response to the Statement of Matters issued on 30 November 2021 by the Secretary of State for Transport pertaining to:

- *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 redetermination 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 to 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 redetermination of the application.*

The Mission had particular regard to the OUV of the inscribed World Heritage property, and the potential impact of the Scheme and its various components on attributes which support the OUV and the integrity of the property. Relevantly in this context, while noting the assessed 'benefits' of the Scheme, the Mission focused on potential opportunities to avoid or reduce negative impacts on OUV. However, the Mission also noted that no further consideration or analysis of alternatives has been undertaken since the original determination of the DCO and World Heritage Committee Decision 44 COM 7B.61.

Provide a succinct report, including advice to the State Party, which is consistent with the previous Decisions of the World Heritage Committee, and which focuses on current circumstances and opportunities to avoid impacts, or if unavoidable mitigate impacts on the OUV of the property

This document provides the required Advisory Mission report.

3.2 Findings

The Stonehenge component of the 'Stonehenge, Avebury and Associated Sites' property (the WHS), is an incomparable archaeological landscape of interlinked monuments, both standing and subterranean. Currently, the surface highway A303, comprising two lanes, cuts across this landscape from east to west for approximately 5.4km. Removal of the surface highway from this landscape would have a positive impact on the WHS and the OUV of the inscribed property.

The tunnel proposed by the Scheme would remove the road from the central part of the WHS, but the construction of dual carriageway in cuttings at either end of the tunnel would adversely and irreversibly impact on the integrity of the WHS, through removal of archaeological features and deposits, through disrupting the spatial and visual links between monuments, and as a result of its overall visual impact. Because some of these changes would be permanent, their effect would be to add to cumulative adverse impacts on the OUV of the inscribed property.

From the perspective that an objective of the Scheme is to minimize any harm to the OUV of the inscribed property, the Mission considers that additional weight should be afforded to avoiding impact on the property, in view of its 'Outstanding Universal Value' and the obligations of the State Party under the *World Heritage Convention*. The Mission considers that the appropriate

‘test’ is not whether there is a net benefit to OUV, but rather how any adverse impact on OUV can be avoided

The Scheme and its routing:

The construction of major infrastructure such as roads, in and in the vicinity of World Heritage properties, has been a concern to the World Heritage Committee owing to the significant negative impacts these features have on the OUV of the property including its authenticity and integrity. In the case of the WHS, the matter is particularly sensitive as the existing road passes close to the iconic ensemble of Neolithic and Bronze age stones as well as a number of other important monuments and other components of the landscape. From this perspective, removing all through traffic from the site would be ideal for the protection of the OUV of the property.

The Mission accepts that the Scheme to upgrade of the A303 with the dual carriageway passing through the heart of the WHS within a tunnel, is the result of methodical and detailed analysis of options to respond to a complex set of demands and needs including those of the communities and villages around the WHS. However, the major concern expressed by the 2018 Advisory Mission and in World Heritage Committee Decision 44 COM 7B.61 remains, namely that the Scheme (particularly at the western end) would: *“impact adversely the Outstanding Universal Value (OUV) of the property, especially affecting its integrity”* and that: *“the scheme should be modified to deliver the best available outcome for the OUV of the property”*. The Mission recalls the finding of the 2018 Mission that although surface routes outside the WHS to the south performed less well for transport and economy, environment and communities, they could have substantial benefits for the WHS.

Notwithstanding the invitation provided in the ‘Statement of Matters’ issued on behalf of the Secretary of State for Transport dated 30 November 2021, and recent Decisions of the World Heritage Committee, no further consideration or analysis of alternatives has been offered by National Highways. Such alternatives would need to be considered in order to explore fully the available opportunities to avoid impacts on OUV.

An alternative route, which re-routes the A303 completely around the WHS, and enables the complete closure of the existing section of the A303 within the WHS, would provide the best option for minimizing any negative impact and enhancing positive benefits to the OUV of the property.

A tunnel beneath the entire length of the WHS would provide the next best option for the OUV of the inscribed property. Insofar as such a tunnel is not feasible, then the alternative should be to extend the underground section of the Scheme at least to the western boundary, with areas to be excavated subject to comprehensive archaeological investigation and salvage and mitigation.

The Scheme currently includes a 3.3km twin tunnel, two short, covered sections, plus approximately 2km of dual carriageway in cuttings and a land bridge. The tunnel would remove the road from the central part of the WHS, but the construction of dual carriageways in cuttings at either end of the tunnel would adversely and irreversibly impact on the integrity of the WHS and the OUV of the property, through removal of archaeological features and deposits, through disrupting the spatial and visual links between monuments, and as a result of its overall visual and functional impact, as well as affecting the overall conceptual understanding of the property as being whole and intact.

If it is determined that removal of surface traffic of A303 from the WHS requires a route through the WHS, the proposed Scheme’s alignment is appropriate and has been adjusted to avoid

potential conflict with Normanton Barrows and the Stonehenge solstice alignment, moved away from the Winterbourne Stoke Barrow Group and informed by an extensive program of archaeological evaluation.

The State Party has advised that following a proposed 'setting study', and having regard to advancements in excavations, research, and understanding of the WHS since its inscription, the boundaries of the property may be revised. The western boundary of the property near the present Longbarrow Junction is one area where some boundary modification may be considered. Hence, this part of the WHS would also be considered particularly significant to the attributes which support the OUV of the property.

The proposed re-location of the Longbarrow junction between the A303 and the A360 outside the property, some 600m to the west would benefit the setting of the Winterbourne Stoke Group and improve the visual setting of the WHS; however, moving the proposed Longbarrow junction even further to the west would increase these benefits.

The loss of archaeological attributes arising from removal of features and deposits would reduce the cumulative benefits of the scheme.

Response to Committee Decisions and Recommendations of previous Advisory Missions

The State Party and its agencies have responded positively to the recommendations of previous Advisory missions and Decisions of the World Heritage Committee by making changes to the Scheme. However, further changes are required to the western portal design in order to deliver the best available outcome for the OUV of the property, consistent with World Heritage Committee Decision 44 COM 7B.61.

Archaeological investigations undertaken to date have accorded with the recommendations of previous Missions. The *Archaeological Evaluation Strategy* and the *Overarching Written Scheme of Investigation for Archaeological Evaluation*, which provide a framework for the archaeological investigations required if the Scheme proceeds, were considered by the 2018 Advisory Mission and have not been re-addressed by the current Mission.

The findings of the 2018 Advisory Mission that the Heritage Monitoring and Advisory Group, in combination with the Scientific Committee provide an appropriate heritage-centred steering mechanism for future stages of decision making and project implementation are supported, and it is apparent and appropriate that the members of the Scientific Committee are empowered to provide unfettered advice.

The Eastern Portal and Approaches

If a tunnel is to be constructed, as the 2018 Advisory Mission and World Heritage Committee have already noted, the proposed eastern portal would have adverse effects arising from removal of subterranean archaeological features, but has been positioned in the least impactful location available which is sufficiently close to the WHS boundary, given the constraints imposed by the attributes of the WHS, other significant sites in the vicinity (including Vespasian's Camp and Blick Mead) and local topographic and environmental conditions.

The location of the eastern portal to the east of The Avenue is an improvement on previous options, although the proposed dual carriageway would still be visible from, and therefore adversely affect, the visual setting of The Avenue.

Although the potential for changes to the water table which affect Blick Mead are low, it would be appropriate to instigate a monitoring regime and to manage any identified effects.

Appropriate community access to, and interpretation of, Blick Mead, Vespasian's Camp, The Avenue and Amesbury Park, would enhance visitor experience of the property and its environs.

The Western Portal and Approaches

The Scheme provides an important one-off opportunity for rehabilitation of the existing intrusive A303, which should be taken to the fullest extent that is reasonably practicable.

The proposed western portal and associated dual carriageway, within a cutting, would have an unacceptable and inappropriate adverse impact on the setting of the Winterbourne Stoke Barrow Group and the physical and visual integrity of the WHS and the Scheme should not proceed without substantial amendment to avoid this impact.

The proposed western portal and associated dual carriageway, within a cutting, would also have an adverse impact on the archaeological resources which would be excavated, and this impact should be minimised.

Extending the proposed tunnel to the west, beyond the boundary of the WHS would enable greater re-connection between the southern and northern sections, an improved setting for the Winterbourne Stoke Group and reduce impacts on archaeological resources within the WHS and on its integrity. However, it is recognised that a longer tunnel would be challenging in view of topographic considerations and design options, and may involve moving the Longbarrow junction back towards the western edge of the WHS.

It is understood that land bridge 4 cannot be made wider than 150m, without becoming a 'tunnel', which would require considerable additional infrastructure; therefore, if a wider land bridge or even multiple land bridges were to be considered, it would be preferable to extend the proposed underground section of the A303 further to the west.

If the Scheme proceeds, the minimum change required, in light of the above considerations, would be an extension of the underground section of the western approach (in tunnel and/or cut-and-cover) at least to the western boundary of the WHS. The western portal should be re-located as far to the west as reasonably practical, thereby reducing the length of the cut-and-cover section and minimising the extent of archaeological resources which must be removed.

Before considering the proposed Development Consent Order, the State Party should modify the design of the Scheme to include an extension of the underground section of the western approach (in tunnel or cut-and-cover) at least to the western boundary of the WHS. Ensuring continued stakeholder engagement in these modifications may demand some additional steps such as notifying all parties who participated in the original examination and give them the opportunity of submitting representations on the proposed change. It is recognised that under UK law the steps to approve and implement the modified Scheme may require a series of approvals, but the Scheme should not proceed until and unless modified as recommended in this report.

Archaeological Resources

The archaeological features of the WHS are important attributes of the inscribed property that contribute to its intactness and wholeness, and thereby to its integrity. Recognising that if the Scheme proceeds, large sections of subterranean archaeological features and deposits will be removed, the extent of such removal should be minimised to the fullest extent that is reasonably

practical. At the western end, this would mean moving the western portal as far to the west as possible, thereby reducing the extent of cut-and-cover required to reach the western boundary of the WHS.

In view of the proposed removal of archaeological features and deposits from what is one of the world's great archaeological landscapes, and the contribution of these elements to the integrity and OUV of the property, should the Scheme proceed, there should be a comprehensive archaeological salvage and mitigation program, consistent with best practice standards and approaches. The methodology, extent, cost and timing of this program should be determined based on expert advice about what is needed to achieve comprehensive archaeological salvage and mitigation.

In light of the diverse opinions expressed by the Scientific Committee on matters such as sampling and recovery, and the opportunities for increasing the understanding of the archaeological landscape brought by emerging digital technologies, it would be appropriate to facilitate ongoing discussions and consideration of the most appropriate methods to achieve comprehensive archaeological salvage and mitigation.

In the event that unexpected archaeological finds were to occur during the course of the comprehensive archaeological salvage and mitigation program, provision should be made to stop work and evaluate options for improved conservation outcomes, including public communication of discoveries.

Other Findings

The State Party is to be acknowledged for putting in place a number of excellent measures and practices. The willing and regular cooperation between different agencies and sectors, most significantly those related to transport and culture, is commendable and has yielded benefits as the Scheme has been developed with extensive inputs from these different agencies and sectors. Other excellent practices included extensive public consultation, establishment of the HMAG and Scientific Committee, thorough Heritage Impact Assessment processes, and the development of remarkable 3D virtual models to help assess the potential impact of the Scheme on the WHS.

The 3D virtual models paid a great deal of attention to light, including the winter solstice, and the impact of night light, as well as different weather conditions. From these and from discussions, the Mission concludes that the lighting arrangements for the tunnel and the surface of the WHS following the closure of the surface road of A303 would be carefully designed for safety as well as for enhancing the 'night sky', an important attribute of the Neolithic and Bronze-age funerary site.

Also, based on consideration of the 3D virtual models and representations from civil society, the Mission concludes that regulations should prevent commercial signs within the WHS.

While the representation within the HMAG is extensive it would benefit from augmentation with addition of expertise in cultural landscape conservation, management and interpretation.

If the Scheme proceeds, the rights of private farmers within the WHS need to be pro-actively protected, including careful attention to new visitor opportunities and circulation patterns, and minimising ancillary impacts. For example, the use of parts of the property for activities such as site compounds, should be avoided.

The State Party has ratified the *World Heritage Convention* and its Articles, and the Decisions of the World Heritage Committee are directly relevant to decision-makers within the State Party; therefore the findings and recommendations of this 2022 Advisory Mission report and the forthcoming Decision of the World Heritage Committee at its 45th session are directly relevant to consideration by the State Party authority for the re-determination of the Scheme's Development Consent Order application.

3.3 *Recommendations*

1. In view of the Outstanding Universal Value (OUV) of the 'Stonehenge, Avebury and Associated Sites' property, and the iconic nature of the Stonehenge component (the WHS) in particular, if the A303 Amesbury to Berwick Down Road project (the Scheme) is approved and implemented the State Party should do all in its power to comply with Decisions of the World Heritage Committee.
2. While the Mission accepts that the Scheme to upgrade the A303 with the dual carriageway passing through the heart of the WHS with a tunnel, is the result of methodical and detailed analysis of options to respond to a complex set of demands and needs including those of the communities and villages around the WHS; nevertheless, in order to avoid adverse impacts on OUV, should the Scheme not proceed, the State Party should revisit alternative surface road options to consider whether one of them might be adapted to remove through traffic from the WHS, thereby minimizing adverse impacts on the OUV of the property, while also responding to the other complex demands and needs.
3. The proposed western portal of the current Scheme, and associated dual carriageway within a cutting, should not proceed without substantial amendment to avoid adverse impacts on the WHS and the OUV of the World Heritage property, to the fullest extent that is reasonably practicable.
4. If the Scheme proceeds, the underground section of the western approach (tunnel and/ or cut-and-cover) should be extended, to at least to the western edge of the WHS boundary.
5. The western portal should be re-located as far to the west as reasonably practical, thereby reducing the length of the cut-and-cover section and minimising the extent of archaeological resources which must be removed.
6. There should be a comprehensive archaeological salvage and mitigation program, consistent with best practice standards and approaches; with methodology, extent, cost and timing determined based on expert advice about what is needed to achieve comprehensive archaeological salvage and mitigation.
7. In the event that unexpected archaeological finds were to occur during the course of the comprehensive archaeological salvage and mitigation program, provision should be made to stop work and evaluate options for improved conservation outcomes, including public communication of discoveries.

8. The proposed Longbarrow junction should be re-located further to the west, insofar as this is practically possible.
9. If the Scheme proceeds, a monitoring regime should be established to identify any changes to the water table which affect Blick Mead, and any such changes should be addressed through a process of adaptive management.
10. Appropriate community access, which is respectful of local interest groups, ownership and sensitivities, should be provided to Blick Mead, Vespasian's Camp, The Avenue and Amesbury Park, all of which should also be interpreted to enhance visitor experience of the WHS and its environs.
11. If the Scheme proceeds, the Scientific Committee should be requested and empowered to facilitate ongoing discussions and consideration of the most appropriate methods to achieve comprehensive archaeological salvage and mitigation.
12. The current representation on the HMAG should be augmented with addition of further expertise in cultural landscape conservation, management and interpretation.
13. If the Scheme proceeds, the rights of private farmers within the WHS should be pro-actively protected, including careful attention to new visitor opportunities and circulation patterns, and minimising ancillary impacts.
14. If the Scheme proceeds, the WHS should not be used for substantial temporary activities such as construction compounds, to the fullest extent practicable.
15. If the Scheme proceeds, all lighting arrangements for the tunnel and the surface of the WHS following the closure of the surface road of A303 should be carefully designed for safety as well as for enhancing the 'night sky', an important attribute of the Neolithic and Bronze-age funerary site.
16. Commercial signs should be prohibited within the WHS.
17. The State Party should ensure that this report is provided in a timely manner to all parties and individuals who may be involved in decision-making or implementation of the Scheme.
18. Revised plans for the Scheme, the rationale for specific changes, and details of the comprehensive archaeological salvage and mitigation program should be submitted to the World Heritage Centre, for review by the Advisory Bodies, prior to implementation, in accordance with paragraph 172 of the *Operational Guidelines for the Implementation of the World Heritage Convention*.
19. As a decision-maker within the State Party, which has ratified the World Heritage Convention, the responsible State Party authority should address obligations arising under the *World Heritage Convention* and Decisions of the Committee, in exercising the role of consent authority for the Scheme.

20. The responsible State Party authority should await the Decision of the World Heritage Committee at its 45th session before re-determining the Scheme's Development Consent Order application.
21. The Development Consent Order should only be issued for the Scheme once the necessary funding to allow the Scheme to be modified in accordance with the Findings and Recommendations of this Mission report, has been identified and committed.
22. If the Development Consent Order is issued for the Scheme, it should subsequently be modified in accordance with the Findings and Recommendations of this Mission report, including provision for the underground section of the western approach to be extended, to at least the western edge of the WHS boundary.

4. Annexures

A. Statement of Outstanding Universal Value

B. Terms of Reference

C. Mission Programme

D. State Party Personnel

E. Mission Briefing Pack April 2022

F. Previous Mission Findings and Recommendations

G. World Heritage Committee Decisions 2017 – 2021

Annexure A. Statement of Outstanding Universal Value

Brief synthesis

The World Heritage property Stonehenge, Avebury and Associated Sites is internationally important for its complexes of outstanding prehistoric monuments. Stonehenge is the most architecturally sophisticated prehistoric stone circle in the world, while Avebury is the largest. Together with inter-related monuments, and their associated landscapes, they demonstrate Neolithic and Bronze Age ceremonial and mortuary practices resulting from around 2000 years of continuous use and monument building between circa 3700 and 1600 BC. As such they represent a unique embodiment of our collective heritage.

The World Heritage property comprises two areas of Chalkland in southern Britain within which complexes of Neolithic and Bronze Age ceremonial and funerary monuments and associated sites were built. Each area contains a focal stone circle and henge and many other major monuments. At Stonehenge these include the Avenue, the Cursuses, Durrington Walls, Woodhenge, and the densest concentration of burial mounds in Britain. At Avebury they include Windmill Hill, the West Kennet Long Barrow, the Sanctuary, Silbury Hill, the West Kennet and Beckhampton Avenues, the West Kennet Palisaded Enclosures, and important barrows.

Stonehenge is one of the most impressive prehistoric megalithic monuments in the world on account of the sheer size of its megaliths, the sophistication of its concentric plan and architectural design, the shaping of the stones - uniquely using both Wiltshire Sarsen sandstone and Pembroke Bluestone - and the precision with which it was built.

At Avebury, the massive Henge, containing the largest prehistoric stone circle in the world, and Silbury Hill, the largest prehistoric mound in Europe, demonstrate the outstanding engineering skills which were used to create masterpieces of earthen and megalithic architecture.

There is an exceptional survival of prehistoric monuments and sites within the World Heritage property including settlements, burial grounds, and large constructions of earth and stone. Today, together with their settings, they form landscapes without parallel. These complexes would have been of major significance to those who created them, as is apparent by the huge investment of time and effort they represent. They provide an insight into the mortuary and ceremonial practices of the period, and are evidence of prehistoric technology, architecture and astronomy. The careful siting of monuments in relation to the landscape helps us to further understand the Neolithic and Bronze Age.

Criterion (i): The monuments of the Stonehenge, Avebury and Associated Sites demonstrate outstanding creative and technological achievements in prehistoric times.

Stonehenge is the most architecturally sophisticated prehistoric stone circle in the world. It is unrivalled in its design and unique engineering, featuring huge horizontal stone lintels capping the outer circle and the trilithons, locked together by carefully shaped joints. It is distinguished by the unique use of two different kinds of stones (Bluestones and Sarsens), their size (the largest weighing over 40 t) and the distance they were transported (up to 240 km). The sheer scale of some of the surrounding monuments is also remarkable: the Stonehenge Cursus and the Avenue are both about 3 km long, while Durrington Walls is the largest known henge in Britain, around 500 m in diameter, demonstrating the ability of prehistoric peoples to conceive, design and construct features of great size and complexity.

Avebury prehistoric stone circle is the largest in the world. The encircling henge consists of a huge bank and ditch 1.3 km in circumference, within which 180 local, unshaped standing

stones formed the large outer and two smaller inner circles. Leading from two of its four entrances, the West Kennet and Beckhampton Avenues of parallel standing stones still connect it with other monuments in the landscape. Another outstanding monument, Silbury Hill, is the largest prehistoric mound in Europe. Built around 2400 BC, it stands 39.5 m high and comprises half a million tonnes of chalk. The purpose of this imposing, skilfully engineered monument remains obscure.

Criterion (ii): The World Heritage property provides an outstanding illustration of the evolution of monument construction and of the continual use and shaping of the landscape over more than 2000 years, from the early Neolithic to the Bronze Age. The monuments and landscape have had an unwavering influence on architects, artists, historians and archaeologists, and still retain a huge potential for future research.

The megalithic and earthen monuments of the World Heritage property demonstrate the shaping of the landscape through monument building for around 2000 years from circa 3700 BC, reflecting the importance and wide influence of both areas.

Since the 12th century when Stonehenge was considered one of the wonders of the world by the chroniclers Henry de Huntington and Geoffrey de Monmouth, the Stonehenge and Avebury Sites have excited curiosity and been the subject of study and speculation. Since early investigations by John Aubrey (1626-1697), Inigo Jones (1573-1652), and William Stukeley (1687-1765), they have had an unwavering influence on architects, archaeologists, artists and historians. The two parts of the World Heritage property provide an excellent opportunity for further research.

Today, the property has spiritual associations for some.

Criterion (iii): The complexes of monuments at Stonehenge and Avebury provide an exceptional insight into the funerary and ceremonial practices in Britain in the Neolithic and Bronze Age. Together with their settings and associated sites, they form landscapes without parallel.

The design, position and interrelationship of the monuments and sites are evidence of a wealthy and highly organised prehistoric society able to impose its concepts on the environment. An outstanding example is the alignment of the Stonehenge Avenue (probably a processional route) and Stonehenge stone circle on the axis of the midsummer sunrise and midwinter sunset, indicating their ceremonial and astronomical character. At Avebury the length and size of some of the features such as the West Kennet Avenue, which connects the Henge to the Sanctuary over 2 km away, are further evidence of this.

A profound insight into the changing mortuary culture of the periods is provided by the use of Stonehenge as a cremation cemetery, by the West Kennet Long Barrow, the largest known Neolithic stone-chambered collective tomb in southern England, and by the hundreds of other burial sites illustrating evolving funerary rites.

Integrity

The boundaries of the property capture the attributes that together convey Outstanding Universal Value at Stonehenge and Avebury. They contain the major Neolithic and Bronze Age monuments that exemplify the creative genius and technological skills for which the property is inscribed. The Avebury and Stonehenge landscapes are extensive, both being around 25 square kilometres, and capture the relationship between the monuments as well as their landscape setting.

At Avebury the boundary was extended in 2008 to include East Kennet Long Barrow and Fyfield Down with its extensive Bronze Age field system and naturally occurring Sarsen Stones. At Stonehenge the boundary will be reviewed to consider the possible inclusion of

related, significant monuments nearby such as Robin Hood's Ball, a Neolithic causewayed enclosure.

The setting of some key monuments extends beyond the boundary. Provision of buffer zones or planning guidance based on a comprehensive setting study should be considered to protect the setting of both individual monuments and the overall setting of the property.

The survival of the Neolithic and Bronze Age monuments at both Stonehenge and Avebury is exceptional and remarkable given their age – they were built and used between around 3700 and 1600 BC. Stone and earth monuments retain their original design and materials. The timber structures have disappeared but postholes indicate their location. Monuments have been regularly maintained and repaired as necessary.

The presence of busy main roads going through the World Heritage property impacts adversely on its integrity. The roads sever the relationship between Stonehenge and its surrounding monuments, notably the A344 which separates the Stone Circle from the Avenue. At Avebury, roads cut through some key monuments including the Henge and the West Kennet Avenue. The A4 separates the Sanctuary from its barrow group at Overton Hill. Roads and vehicles also cause damage to the fabric of some monuments while traffic noise and visual intrusion have a negative impact on their settings. The incremental impact of highway-related clutter needs to be carefully managed.

Development pressures are present and require careful management. Impacts from existing intrusive development should be mitigated where possible.

Authenticity

Interventions have been limited mainly to excavations and the re-erection of some fallen or buried stones to their known positions in the early and mid-twentieth century in order to improve understanding. Ploughing, burrowing animals and early excavation have resulted in some losses but what remains is remarkable in its completeness and concentration. The materials and substance of the archaeology supported by the archaeological archives continue to provide an authentic testimony to prehistoric technological and creative achievement.

This survival and the huge potential of buried archaeology make the property an extremely important resource for archaeological research, which continues to uncover new evidence and expand our understanding of prehistory. Present day research has enormously improved our understanding of the property.

The known principal monuments largely remain in situ and many are still dominant features in the rural landscape. Their form and design are well-preserved and visitors are easily able to appreciate their location, setting and interrelationships which in combination represent landscapes without parallel.

At Stonehenge several monuments have retained their alignment on the Solstice sunrise and sunset, including the Stone Circle, the Avenue, Woodhenge, and the Durrington Walls Southern Circle and its Avenue.

Although the original ceremonial use of the monuments is not known, they retain spiritual significance for some people, and many still gather at both stone circles to celebrate the Solstice and other observations. Stonehenge is known and valued by many more as the most famous prehistoric monument in the world.

There is a need to strengthen understanding of the overall relationship between remains, both buried and standing, at Stonehenge and at Avebury.

Protection and management requirements

The UK Government protects World Heritage properties in England in two ways: firstly, individual buildings, monuments and landscapes are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 and the 1979 Ancient Monuments and Archaeological Areas Act, and secondly through the UK Spatial Planning system under the provisions of the Town and Country Planning Acts. The individual sites within the property are protected through the Government's designation of individual buildings, monuments, gardens and landscapes.

Government guidance on protecting the Historic Environment and World Heritage is set out in National Planning Policy Framework and Circular 07/09. Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents. The protection of the property and its setting from inappropriate development could be further strengthened through the adoption of a specific Supplementary Planning Document.

At a local level, the property is protected by the legal designation of all its principal monuments. There is a specific policy in the Local Development Framework to protect the Outstanding Universal Value of the property from inappropriate development, along with adequate references in relevant strategies and plans at all levels. The Wiltshire Core Strategy includes a specific World Heritage Property policy. This policy states that additional planning guidance will be produced to ensure its effective implementation and thereby the protection of the World Heritage property from inappropriate development. The policy also recognises the need to produce a setting study to enable this. Once the review of the Stonehenge boundary is completed, work on the setting study shall begin.

The Local Planning Authority is responsible for continued protection through policy development and its effective implementation in deciding planning applications with the management plans for Stonehenge and Avebury as a key material consideration. These plans also take into account the range of other values relevant to the site in addition to Outstanding Universal Value. Avebury lies within the North Wessex Downs Area of Outstanding Natural Beauty, a national statutory designation to ensure the conservation and enhancement of the natural beauty of the landscape.

About a third of the property at both Stonehenge and Avebury is owned and managed by conservation bodies: English Heritage, a non-departmental government body, and the National Trust and the Royal Society for the Protection of Birds which are both charities. Agri-environment schemes, an example of partnership working between private landowners and Natural England (a non-departmental government body), are very important for protecting and enhancing the setting of prehistoric monuments through measures such as grass restoration and scrub control. Much of the property can be accessed through public rights of way as well as permissive paths and open access provided by some agri-environment schemes. Managed open access is provided at Solstice. There are a significant number of private households within the property and local residents therefore have an important role in its stewardship

The property has effective management plans, coordinators and steering groups at both Stonehenge and Avebury. There is a need for an overall integrated management system for the property which will be addressed by the establishment of a coordinating Stonehenge and Avebury Partnership Panel whilst retaining the Stonehenge and Avebury steering groups to enable specific local issues to be addressed and to maintain the meaningful engagement of the community. A single property management plan will replace the two separate management plans.

An overall visitor management and interpretation strategy, together with a landscape strategy needs to be put in place to optimise access to and understanding of the property. This should include improved interpretation for visitors and the local community both on site and in local

museums, holding collections excavated from the property as well as through publications and the web. These objectives are being addressed at Stonehenge through the development of a visitor centre and the Interpretation, Learning and Participation Strategy. The updated Management Plan will include a similar strategy for Avebury. Visitor management and sustainable tourism challenges and opportunities are addressed by specific objectives in both the Stonehenge and Avebury Management Plans.

An understanding of the overall relationship between buried and standing remains continues to be developed through research projects such as the “Between the Monuments” project and extensive geophysical surveys. Research Frameworks have been published for the Site and are regularly reviewed. These encourage further relevant research. The Woodland Strategy, an example of a landscape level management project, once complete, can be built on to include other elements of landscape scale planning.

It is important to maintain and enhance the improvements to monuments achieved through grass restoration and to avoid erosion of earthen monuments and buried archaeology through visitor pressure and burrowing animals.

At the time of inscription the State Party agreed to remove the A344 road to reunite Stonehenge and its Avenue and improve the setting of the Stone Circle. Work to deliver the closure of the A344 will be complete in 2013. The project also includes a new Stonehenge visitor centre. This will provide world class visitor facilities including interpretation of the wider World Heritage property landscape and the removal of modern clutter from the setting of the Stone Circle. Although substantial progress is being made, the impact of roads and traffic remains a major challenge in both parts of the World Heritage property. The A303 continues to have a negative impact on the setting of Stonehenge, the integrity of the property and visitor access to some parts of the wider landscape. A long-term solution remains to be found. At Avebury, a World Heritage Site Traffic Strategy will be developed to establish guidance and identify a holistic set of actions to address the negative impacts that the dominance of roads, traffic and related clutter has on integrity, the condition and setting of monuments and the ease and confidence with which visitors and the local community are able to explore the wider property.

Annexure B. Terms of Reference

Terms of Reference

UNESCO/ICOMOS/ICCROM Advisory Mission

STONEHENGE, AVEBURY AND ASSOCIATED SITES, UNITED KINGDOM

The purpose of the 2022 joint Advisory Mission to Stonehenge, Avebury and Associated Sites World Heritage property by the UNESCO World Heritage Centre, ICOMOS and ICCROM is to review the UK's progress on resolving the dual issues of upgrading the A303 road while also addressing its impact on the Stonehenge landscape; (an issue that has been an item of concern since the inscription of the property on the World Heritage List in 1986); and on addressing **Decision 44COM 7B.61** of the World Heritage Committee.

The current A303 improvement scheme has £1.7 billion committed by the UK Government. However, a High Court decision on 30 July 2021 has quashed the previously-issued Development Consent Order for the scheme, and the Secretary of State for Transport will re-determine the matter, having regard, among other factors, to Decisions of the World Heritage Committee and the effect of the current A303 improvement scheme on the OUV of the property.

Decision 44 COM 7B.61 reiterated the concern identified in the 2018 mission report that portions of the proposed A303 improvement scheme (particularly at the western end) would “*impact adversely the Outstanding Universal Value (OUV) of the property, especially affecting its integrity*” and considers that “*the scheme should be modified to deliver the best available outcome for the OUV of the property*”.

The UK State Party invites the Advisory Mission to assess progress on the A303 improvement scheme so that it delivers the best available outcome for the OUV of the property. The Advisory Mission should not re-visit the history of the A303 improvement scheme (which is well documented in the 2018 Advisory Mission report), but should focus on current circumstances and opportunities.

The main tasks of the 2022 Advisory Mission are to:

1. Make a site visit to Stonehenge, Avebury and Associated Sites World Heritage property;
2. Explore and evaluate the scheme and possible modifications under consideration since the World Heritage Committee Decision of 2021 and any further proposals to achieve design and delivery in the best way possible for the attributes which support the OUV and integrity of the property;
3. Provide a succinct report, including advice to the State Party, which is consistent with the previous Decisions of the World Heritage Committee, and which focuses on current circumstances and opportunities to avoid impacts, or if unavoidable mitigate impacts on the OUV of the property.

The State Party will facilitate necessary consultation with project personnel, State Party agencies and key stakeholders and will arrange for field visits to key locations within the property and its environs.

To enable the preparation for the Advisory Mission, the following documents will be provided to the World Heritage Centre as soon as possible and no later than three weeks prior to the mission:

- A clear indication of the ‘A303 improvement scheme’ which is currently under consideration;
- A short written description (or schedule) of any changes made to the A303 improvement scheme since previous consideration by the World Heritage Committee;
- Plans, visualisations, presentations and other documents which illustrate the current scheme and any such changes;
- An indication of modifications that are under consideration or have been considered since the High Court decision; and
- Advice provided by Historic England, technical advisers or other relevant representations on the current A303 improvement scheme.

The Advisory Mission should prepare and submit the final succinct report (in electronic format) to the UK State Party within six weeks following the completion of the mission at the latest.

Annexure C. Mission Programme

Time	Location	Session	Duration
Day One - Tuesday 19 April 2022			
Afternoon	Various	Mission advisors transported from airport / train station to Milford Hall Hotel	1-2 hours
17:00 - 18:15	Milford Hall Hotel	Welcome and introductions Housekeeping (health and safety, security arrangements) Overview of the mission programme Overview of managing change in World Heritage Sites in England - led by Historic England	1 hour 15 minutes
18:15 - 19:00	Salisbury City Centre	Walking tour of Salisbury City Centre - led by Historic England	45 minutes
19:00 - 21:00	Salisbury Cathedral	Dinner and reception at Salisbury Cathedral	2 hours
Day Two - Wednesday 20 April 2022			
07:30 - 08:00	N/A	Travel from Milford Hall Hotel to Stonehenge Visitor Centre	30 minutes
08:00 - 09:30	Stonehenge	Early morning tour of Stonehenge - led by English Heritage Trust	1 hour 30 minutes
09:30 - 13:00	Various	Stonehenge landscape tour - led by the National Trust - Part 1	3 hours 30 minutes
13:00 - 14:00	The Bridge Inn, Upper Woodford	Lunch	1 hour
14:00 - 14:30	N/A	Travel from The Bridge Inn to Antrobus House	30 minutes

14:30 - 17:00	Antrobus House	<p>Meetings with Civil Society groups:</p> <p><u>Stonehenge Alliance</u> Kate Fielden John Adams</p> <p><u>Scientific Committee</u> Barry Cunliffe Mike Parker Pearson Josh Pollard David Field Tim Darvill Mike Pitts Andrew Fitzpatrick</p> <p><u>Museum / curator representatives</u> David Dawson (Wiltshire Museum) Andy Rhind-Tutt (Amesbury Museum & Heritage Trust) Brian Edwards (Amesbury Museum & Heritage Trust)</p> <p><u>Druid Order representatives</u> Arthur Pendragon David Loxley Frank Somers</p> <p><u>Landowner / farming representatives</u> Hugh Morrison Rachel Hosier Rob Turner</p> <p><u>Local community representatives</u> Janice Hassett (Stonehenge Traffic Action Group) Robert Yuill (Amesbury Town Council) Andy Shuttleworth (Winterbourne Stoke Parish Council) Ron Lock (Shrewton Parish Council)</p>	2 hours 30 minutes
17:00 - 17:30	N/A	Travel from Antrobus House to Milford Hall Hotel	30 minutes
17:30 - 19:00	Milford Hall Hotel	Open session with heritage bodies on the proposed A303 scheme	1 hour 30 minutes
19:00 - 19:30	N/A	Travel from Milford Hall Hotel to The Chapter House	30 minutes

19:30 - 21:30	The Chapter House, Salisbury	Dinner hosted by the State Party	2 hours
Day Three - Thursday 21 April 2022			
09:30 - 12:30	Milford Hall Hotel	Continuation of the Stonehenge landscape tour - led by the National Trust - Part 2	3 hours
12:30 - 13:00	Milford Hall Hotel	Travel back to Milford Hall Hotel	30 minutes
13:00 - 14:00	Milford Hall Hotel	Virtual meeting with UK Government Ministers: <ul style="list-style-type: none"> - Nigel Huddleston, Parliamentary Under-Secretary of State for Sport, Tourism, Heritage and Civil Society, Department for Digital, Culture, Media and Sport - Baroness Vere of Norbiton, Parliamentary Under-Secretary of State, Department for Transport 	1 hour
14:00 - 15:00	Milford Hall Hotel	Lunch and discussion with Heritage Monitoring and Advisory Group (HMAG)	1 hour
15:00 - 17:30	Milford Hall Hotel	Closed session with the State Party and the developer on the proposed A303 scheme	2 hours 30 minutes
17:30 - 18:00	Milford Hall Hotel	Final reflections and close	30 minutes
Day Four - Friday 22 April 2022			
Various	N/A	Mission advisors transported to airport / train station on Friday 22 April	N/A

Annexure D. State Party Personnel

State Party participants throughout the Advisory Mission included:

1. Laura Davies, Permanent Delegate and Ambassador of Great Britain and Northern Ireland to UNESCO, UK Delegation
2. Rachel Heatherly, UNESCO Policy Lead and SRO, Foreign, Commonwealth & Development Office
3. Duncan Parish, Deputy Director, Tourism, International & Cultural Diplomacy, Department for Digital, Culture, Media & Sport
4. Fazima Osborn, Deputy Director, Heritage, Department for Digital, Culture, Media & Sport
5. Keith Nichol, Head of Cultural Diplomacy, Department for Digital, Culture, Media & Sport
6. Henry Reed, Senior International Policy Adviser, Department for Digital, Culture, Media & Sport
7. Rebecca Barrett, Regional Director – South West, Historic England
8. Alexandra Warr, Head of International Strategy, Historic England
9. Dr Helen Woodhouse, Senior International Adviser, Historic England
10. David Stuart, Historic Places Advisor (South West), Historic England
11. Duncan McCallum, Strategy and Listing Director, Historic England
12. Councillor Richard Clewer, Leader of the Council and Cabinet Member for MCI, Economic Development, Heritage, Arts, Tourism, Wiltshire Council
13. Councillor Dr Mark McClelland, Cabinet Member for Transport, Waste, Street Scene and Flooding, Wiltshire Council
14. Peter Binley, Director Highways and Transport (Acting), Wiltshire Council
15. Melanie Pomeroy-Kellinger, County Archaeologist, Wiltshire Council
16. Anne Carney, World Heritage Site Partnership Manager, Stonehenge & Avebury WHS Coordination Unit
17. Emma Sayer, Chair of World Heritage Site Partnership Panel
18. Nichola Tasker, Stonehenge & West Territory Director, English Heritage Trust
19. Scott Ashman, Head of Historic Properties, Stonehenge, English Heritage Trust
20. Dr Heather Sebire, Senior Property Curator for Stonehenge, English Heritage Trust
21. Dr Ingrid Samuel, Placemaking & Heritage Director, National Trust
22. Dr Nick Snashall, Archaeologist for the Stonehenge & Avebury World Heritage Site, National Trust
23. Nick Simms, Senior Project Manager, Stonehenge Projects, National Trust
24. Nick Droy, Assistant Director of Operations for South West Landscapes, National Trust
25. Rosemary Hopkins, Deputy Director for Roads and Projects Infrastructure Delivery, Department for Transport
26. Richard Gould, Senior Project Sponsor, Roads and Project Infrastructure Delivery, Department for Transport
27. Derek Parody, Project Director, A303 Stonehenge, National Highways
28. David Bullock, Project Manager, A303 Stonehenge, National Highways
29. Chris Moore, Technical Partner - Deputy Heritage Lead
30. Dr Matt Leivers, A303 Consultant Archaeologist, Wessex Archaeology
31. Professor Sir Barry Cunliffe, Chair of Scientific Committee
32. John Glen, MP for Salisbury
33. Nigel Huddleston, Parliamentary Under-Secretary of State for Sport, Tourism, Heritage and Civil Society, Department for Digital, Culture, Media and Sport
34. Baroness Vere of Norbiton, Parliamentary Under-Secretary of State, Department for Transport

Annexure E. Mission Briefing Pack April 2022

Stonehenge, Avebury and Associated Sites Advisory Mission of 19-22 April 2022 Pre-Mission Reading Pack

Introduction

The State Party welcomes the opportunity for an Advisory Mission to the Stonehenge, Avebury and Associated Sites property, to be focussed on the agreed Terms of Reference (see Appendix A).

This document includes an update on the re-determination of the A303 scheme and provides information requested in the Terms of Reference for the Mission, which is ordered as follows:

1. [A clear indication of the ‘A303 improvement scheme’ which is currently under consideration;](#)
2. [A short written description \(or schedule\) of any changes made to the A303 improvement scheme since previous consideration by the World Heritage Committee;](#)
3. [Plans, visualisations, presentations and other documents which illustrate the current scheme and any such changes;](#)
4. [An indication of modifications that are under consideration or have been considered since the High Court decision; and](#)
5. [Advice provided by Historic England, technical advisers or other relevant representations on the current A303 improvement scheme.](#)

Please note that this document focuses on current circumstances and opportunities, and advice provided since previous consideration by the World Heritage Committee, in accordance with the focus of the agreed Terms of Reference. The State Party’s 2022 and 2020 State of Conservation Reports (and the update provided in 2021) outline the advice that has been provided on the current scheme since its Examination in 2019.

1. A clear indication of the ‘A303 improvement scheme’ which is currently under consideration

The proposed A303 Stonehenge improvement scheme addresses a 13-kilometre section of the A303 between Amesbury and Berwick Down, providing a two-lane dual carriageway and a deep twin-bored tunnel which would remove the road from most of the World Heritage property around Stonehenge.

The scheme includes two new junctions – a flyover above the Countess roundabout to the east of the property, and to its west, a new junction, replacing the existing Longbarrow roundabout, to connect the A303 and A360 outside the western boundary of the property. Further to the west, there would be a bypass to the north of the village of Winterbourne Stoke, with a viaduct over the River Till valley. The scheme also includes an extensive network of public rights of way to improve accessibility of the WHS and beyond for pedestrians, cyclists and horse riders.

A detailed overview of the scheme can be found [here](#) in section 4.1 of the 'Case for the Scheme and National Policy Statement Accordance' document, and [here](#) in the 'Environmental Statement Non-Technical Summary' document. The Non-Technical Summary document includes detailed maps of the scheme on pages 18-23 with the central section within the World Heritage Site on pages 20-21.

One of the main benefits of the scheme is to address the longstanding threat to the Outstanding Universal Value of the property posed by the existing surface A303, which divides the property across its full width. The proposals include the following key components:

- Relocating 3.3km of the existing A303 surface road through the property within a tunnel, with the location of the tunnel portals optimised to minimise adverse impacts and maximise benefits to the Outstanding Universal Value of the property;
- Setting the new road in the western part of the property in a deep retained cutting, incorporating a 150m wide land bridge designed to provide physical and visual connectivity between key monument groups;
- Setting the approach to the eastern portal in a cutting connecting to the existing surface dual carriageway, which is reduced in length by 50% and the redundant portion restored to grass, reuniting the Stonehenge Avenue that is severed by the current A303;
- Replacing the existing Longbarrow roundabout with a new A360 junction, relocated 600m west of the WHS property, removing road infrastructure from the immediate proximity of key barrow groups;
- Upgrading the Countess junction with the A345 on the eastern edge of the WHS property to provide a new flyover; and
- Creating 17km of new and upgraded rights of way both within and in the vicinity of the property to improve connectivity and accessibility for pedestrians, cyclists and horse riders.

Previous Missions' Advisors have needed to rely on plans to visualise how the scheme would fit within and impact on the World Heritage property. The State Party recognises that this is less than ideal and consequently National Highways has developed a virtual reality interactive and immersive tool to assist the Mission Advisors. The tool will allow the Mission Advisors to explore the extent of the current problem from all vantage points and consider how the new road seeks to address the current situation and assess its impact on the Outstanding Universal Value of the property. The virtual reality tool has been modelled on real mapping, traffic and audio data. The slide deck shown in Appendix B shows still images from the virtual reality model in key locations.

The full virtual reality tool will be available for Mission Advisors to use throughout their visit to aid understanding of the scheme. This will allow the Mission Advisors to walk parts of the property and view the landscape, both with the current road and with the scheme in place.

The A303 scheme is designed in the context of the whole of the World Heritage property and its Outstanding Universal Value, specifically aligning with the 2015 World Heritage Site Management Plan. Section 12.3 of National Highways' Heritage Impact Assessment, *Alignment with WHS Management Plan vision, aims and Policies*, considers the ways in which the Scheme delivers against the aims and policy set out in the 2015 WHS Management Plan as summarised below (Table 1).

Table 1 Provided by National Highways at the request of the State Party to summarise how the scheme respond to the 2015 WHS Management Plan Aims and Policies

2015 WHS Management Plan Aims and Policies	Scheme response
<p>Aim 1: The Management Plan will be endorsed by those bodies and individuals responsible for its implementation as the framework for long-term detailed decision-making on the protection and enhancement of the WHS and the maintenance of its Outstanding Universal Value (OUV). Its aims and policies should be incorporated in relevant planning guidance and policies.</p> <ul style="list-style-type: none"> ● Policy 1e – Minimise light pollution to avoid adverse impacts on the WHS, its setting and its attributes of OUV. 	<ul style="list-style-type: none"> ● Removing the intrusion of traffic and associated light pollution from the WHS to enhance dark skies and appreciation of astronomical alignments (1e) ● Keeping lighting within the WHS to the absolute minimum needed for safety, with no lighting of the tunnel portals or approaches (1e) ● Designing the new Longbarrow junction with no lighting and moving it to the west and away from the property (1e)
<p>Aim 3: Sustain the OUV of the WHS through the conservation enhancement of the Site and its attributes of OUV.</p> <ul style="list-style-type: none"> ● Policy 3a – Manage the WHS to protect the physical remains which contribute to its attributes of OUV and improve their condition. ● Policy 3c – Maintain and enhance the setting of monuments and sites in the landscape and their inter-relationships and astronomical alignments with particular attention given to achieving an appropriate landscape setting for the monuments and the WHS itself. ● Policy 3d – Improve the WHS landscape by the removal, redesign or screening of existing intrusive structures such as power lines, fences 	<ul style="list-style-type: none"> ● Removing severance of the World Heritage property along the full length of the tunnel (3c) ● Providing landscape connectivity between key monument groups in the western part of the property with the provision of a 150m wide land bridge (3c) ● Relocating the junction with the A360 outside the WHS and diverting approximately 1.25km of the A360 from the edge of the WHS, improving the settings of the Winterbourne Stoke Crossroads and Diamond Groups monuments and benefitting the OUV of the WHS. (3c)

<p>and unsightly buildings where opportunities arise.</p> <ul style="list-style-type: none"> ● Policy 3f – Encourage land management activities and measures to maximise the protection of archaeological monuments and sites as well as their settings, and the setting of the WHS itself. ● Policy 3g – Maintain, enhance and extend existing areas of permanent grassland where appropriate. ● Policy 3i – Sustain and enhance the attributes of OUV through woodland management while taking into account the WHS’s ecological and landscape values. 	<ul style="list-style-type: none"> ● Reducing the extent of new infrastructure within the WHS through the net removal of 1km of the dual carriageway and re-use of the remaining section between the eastern tunnel portal and Countess junction. (3d) ● Removing redundant highway signage (3d) ● Recreating chalk grassland habitat, delivering additional biodiversity and reducing the extent of agricultural cultivation within the property, minimising damage to monuments and sites from cultivation and restoring the character of the landscape without parallel (3a, 3f, 3g) ● Avoiding new planting within the WHS (3i)
<p>Aim 4: Optimise physical and intellectual access to the WHS for a range of visitors and realise its social and economic benefits while at the same time protecting the WHS and its attributes of OUV.</p> <ul style="list-style-type: none"> ● Policy 4a – Management of visitors to the WHS should be exemplary and follow relevant national and international guidance on sustainable tourism. ● Policy 4b – Spread the economic benefits from tourism related to the WHS throughout the wider community. ● Policy 4c – Encourage access and circulation to key archaeological sites within the WHS landscape. Maintain appropriate arrangements for managed open access on foot (taking into account archaeological, ecological and community sensitivities) to increase public awareness and enjoyment. 	<ul style="list-style-type: none"> ● Removing the surface A303 between the western edge of the WHS and north of Vespasian’s Camp, a significant barrier to public access to the wider WHS landscape, opening opportunities for future extension of open access rights. (4a, 4b, 4c) ● Creating new public rights of way along the western edge of the WHS, linking to the visitor centre in the north and the WHS boundary to the south (4a, 4b, 4c) ● Converting redundant surface sections of the A303 within the WHS and the A360 on the western boundary of the WHS to public rights of way (4a, 4b, 4c)
<p>Aim 5: Improve the interpretation of the WHS to increase understanding and enjoyment of its special characteristics and maximise its educational potential. Engage the local community in the stewardship and management of the WHS.</p> <ul style="list-style-type: none"> ● Policy 5a – Improve the interpretation both on and off site to enhance enjoyment and appreciation of the WHS. 	<ul style="list-style-type: none"> ● Opportunities for improved interpretation through improved accessibility and direct engagement with the local community during the delivery of the Scheme and through legacy and benefits projects (5a)

<p>Aim 6: Reduce significantly the negative impacts of roads and traffic on the WHS and its attributes of OUV and increase sustainable access to the WHS.</p> <ul style="list-style-type: none"> ● Policy 6a – Identify and implement measures to reduce the negative impacts of roads, traffic and parking on the WHS and to improve road safety and the ease and confidence with which residents and visitors can explore the WHS. ● Policy 6b – Manage vehicular access to byways within the WHS to avoid damage to archaeology, improve safety and encourage exploration of the landscape on foot whilst maintaining access for emergency, operational and farm vehicles and landowners. ● Policy 6c – Take measures through sustainable transport planning to encourage access to the WHS other than by car. 	<ul style="list-style-type: none"> ● Removal of trunk road traffic from much of the landscape and downgrading of the existing A303 (6a) ● Removing the existing vehicular link between byways in the vicinity of the Normanton Down barrow group, enhancing tranquillity of the WHS at this location (6b) ● Providing in total more than 17km of new routes greatly improving access both within and to the property for pedestrians, cyclists and horse riders (6c)
--	---

Indication of current Status of the A303 improvement scheme

As outlined in the State Party’s 2022 State of Conservation Report, the Secretary of State for Transport is re-determining the scheme’s Development Consent Order (DCO) application, following the legal challenge in July 2021 where the High Court ruled that the decision-making process that was followed was unlawful. The upholding of the legal challenge did not relate to the merits of the scheme or any of the information submitted as part of the DCO application process; it related solely to the manner in which the Secretary of State for Transport arrived at the decision.

The re-determination process requires the Secretary of State for Transport to take into account the successful legal grounds to demonstrate consideration of impacts on all heritage assets and the alternatives to the scheme.

In November 2021, the Secretary of State for Transport issued what’s known as a “[Statement of Matters](#)” inviting National Highways to provide further information on a number of matters. National Highways provided their initial response on 11 January 2022, with a summary of the individual documents provided in this [cover letter](#). Additional environmental reports were subsequently submitted by National Highways in February 2022. The individual response documents can be found in the hyperlinks set out below:

- [Alternatives considered in the Examining Authority’s report](#)
- [Local and national policies](#)
- [Carbon budgets and climate](#)
- [Environmental information](#)
- [Transport Assessment Review](#)

- [Any other matters](#)

On 24 February 2022 the [Secretary of State for Transport invited](#) other parties to provide their comments on his Statement of Matters, the responses from National Highways in January and February 2022, and any other representations published on the Planning Inspectorate’s website. The Secretary of State for Transport also invited National Highways to update the relevant section of their earlier response related to carbon. The deadline for responses is 4 April 2022.

2. A short written description (or schedule) of any changes made to the A303 improvement scheme since previous consideration by the World Heritage Committee

No alterations have been made to the A303 scheme since previous consideration by the World Heritage Committee in July 2021 and the result of the High Court decision. As outlined in the State Party’s 2022 State of Conservation Report, the State Party considers that the iterative design refinements to the scheme, particularly since the previous Advisory Mission in 2018, has resulted in a proposal that has significantly improved upon its predecessors.

The evolution of the current scheme benefited greatly from that third joint World Heritage Centre/ICOMOS Advisory Mission in March 2018. Following the last Advisory Mission further improvements were made to the scheme before the DCO application was made later in 2018. These were outlined in Table 1 in the State Party’s 2022 State of Conservation Report, and are included below (Table 2) for ease of reference.

Table 1 Elements incorporated into the scheme to minimise negative effects and enhance positive effects on the attributes that convey the OUV of the WHS (extract from the State Party’s 2022 State of Conservation Report)

	Elements Incorporated into the scheme to Minimise Negative Effects and Enhance Positive Effects on the Attributes that convey the OUV of the WHS	
Heritage Impact (Examples of Attributes affected)	2017 Preferred Route	2018 DCO Scheme (following 3rd joint World Heritage Centre/ICOMOS Advisory Mission)
Severance of the Stonehenge Avenue (Attributes 1, 2, 6)	Reconnection of the Avenue to enhance its integrity	Confirmed reconnection of the Avenue including establishment of chalk grassland
Interruption of the midwinter solstice alignment (Attribute 4)	Western portal repositioned to remove severance of the	Design refinements to avoid intrusion of highway infrastructure and traffic,

	midwinter solstice alignment caused by the current A303	and associated light pollution into the midwinter solstice alignment
Harmful impact within the setting of Winterbourne Stoke Crossroad Barrows, Diamond Group due to the existing Longbarrow junction (Attributes 2, 3, 5)	Relocation of the existing A360 road and the replacement Longbarrow roundabout 100m west	Relocation of the existing A360 road and the replacement of Longbarrow roundabout by a further 500m (to a total of 600m to the west, outside of WHS)
Visual & Aural Effects of Traffic on A303 (Attributes 3, 6, 7)	Existing A303 replaced with a restricted byway for use only by walkers, cyclists and horse riders, farm and emergency vehicles	Confirmed downgrading of existing A303 and approximately 1.25km of the A360 to restricted byways designed to integrate with chalk grassland and so reduce severance, providing the ability to explore the WHS and beyond
Visual & Aural Effects and Severance of Landscape (Attributes 3, 6, 7)	Bored tunnel at least 2.9km long	Tunnel length through the centre of WHS increased to 3.3km. Cutting design with shallow grass slopes and chalk grassland mitigation softens views of the cutting from heritage assets important to the understanding of the OUV, within the WHS
Ability to Explore the WHS and Experience the Relationships between Monuments (Attributes 3, 5, 6)	Reconnection of public rights of way currently severed by the A303	Removal of vehicular link between byways in vicinity of Normanton Down Barrow Asset Group, ensuring enhanced tranquillity of the WHS at this location
Loss of archaeological remains through excavation of the western and eastern cuttings (Attributes, 2, 6)	Western portal and approach cutting positioned through an area where the evidence from prior evaluation and survey demonstrates that the	Detailed Archaeological Mitigation Strategy (DAMS) to ensure delivery of archaeological programme to the highest standards, commensurate with

	archaeological impacts can be effectively minimised	international importance of WHS
Severance between monuments (Attributes 2, 3, 5, 6)	Positions of tunnel portals optimised within the landscape Removal of severance from the King Barrow Ridge and associated barrow groups to the south	Road (and traffic on it) designed to be hidden within deep retained cuttings Inclusion of an extended 150m green land bridge towards the western end of the WHS, designed to reduce the visual severance between monuments and reinstate physical access between them
Restoring the character of the landscape without parallel (Attributes 2, 6)	Removal of current surface road infrastructure helping to eliminate physical intrusions in the landscape and improve the experience for users	Recreating chalk grassland habitat, delivering additional biodiversity and reducing the extent of agricultural cultivation within the WHS
Disturbance of dark skies (Attribute 4)	Subject to design for DCO	No lighting of eastern and western tunnel portals, or approaches, or on new Longbarrow junction Keeping lighting within WHS to absolute minimum needed for safety; achieving positive impact upon dark skies and appreciation of astronomical alignments

3. Plans, visualisations, presentations and other documents which illustrate the current scheme and any such changes

A range of documents, including plans, visualisations and presentations have been included both within and as appendices to this document to further illustrate the current scheme.

4. An indication of modifications that are under consideration or have been considered since the High Court decision

The State Party acknowledges **44 COM 7B.61** which reiterated the concern identified in the 2018 Advisory Mission Report that portions of the proposed A303 improvement scheme (particularly at the western end) would “*impact adversely the Outstanding Universal Value (OUV) of the property, especially affecting its integrity*” and considers that “*the scheme should be modified to deliver the best available outcome for the OUV of the property*”.

The State Party has given this serious consideration and consequently National Highways have identified a number of potential modifications and design refinements that may address this concern, and the State Party would welcome the opportunity to explore these at the forthcoming Mission.

The draft DCO as developed through Examination in public in 2019 allows for a level of flexibility within defined limits. Those defined limits of flexibility relate to aspects of the detailed design of the scheme, the construction of the scheme, and its maintenance post-construction. Within these defined limits (‘the limits of deviation’) there is potential for design refinements and modifications to be considered as part of the detailed design of the scheme, subject to approvals by the Department for Transport.

A number of design refinement options that benefit the OUV of the property may be deliverable within the limits of deviation and are under consideration. These refinements focus on reducing the length and width of exposed cutting within the property in the western tunnel approach by:

- Reducing the length of the exposed cut and providing additional landscape connectivity
- Reducing the width of the exposed cut to better conceal the tunnel portals and retaining walls within the landscape

The State Party would welcome the opportunity to explore these potential design refinement options with the Mission Advisors.

5. Advice provided by Historic England, technical advisers or other relevant representations on the current A303 improvement scheme.

The State Party’s 2022 and 2020 State of Conservation Reports (and the update provided in 2021) outline the advice that has been provided on the current scheme since its Examination in 2019.

The State Party has outlined below the advice that has been provided since the last World Heritage Committee meeting in July 2021 by:

- Historic England, and:

- the technical advisers to the A303 improvement scheme as identified in the State Party's 2022 State of Conservation Report:
 - the Heritage Monitoring and Advisory Group (HMAG)
 - the Scientific Committee
 - the Stakeholder Design Consultation Group (SDCG)

In the period following the World Heritage Committee meeting in July 2021, Historic England's role has primarily been to provide advice to National Highways and their archaeological contractor, Wessex Archaeology, through the Heritage Monitoring and Advisory Group (HMAG). HMAG advises on heritage matters as set out in the State Party's 2022 State of Conservation Report. This engagement takes place through regular meetings of the group and informal discussion focused on heritage documentation. A copy of the Terms of Reference for HMAG is within Appendix C.

Historic England has not submitted any formal advice in relation to the A303 scheme since the last World Heritage Committee meeting in July 2021. Its advice on the scheme was presented as part of the DCO Examination.

Historic England's submission in response to the matters raised by the Secretary of State for Transport under his redetermination of the DCO will be made available in due course along with any other relevant representations made by other Interested Parties. The deadline for submission has been set by the Secretary of State for Transport as 4 April 2022. The State Party will ensure that these representations are provided to the Advisory Mission as soon as they are made publicly available.

Advice has also continued to be provided by the other members of HMAG - Wiltshire Council, the English Heritage Trust and the National Trust – during this same period on the topics and documents as outlined in the State Party's 2022 State of Conservation Report.

Since December 2021 HMAG have continued to engage with National Highways and the development of the scheme, in this time there have been 4 further HMAG Meetings. HMAG engagement in these meetings has focussed on the programme for informal consultation and the provision of technical advice relating to the historic environment. This helps to ensure that the scope of archaeological mitigation works, as set out in Archaeological Method Statements (AMS), site-specific written schemes of investigation (SSWSIs) and related reports are of the highest quality and professional standards. HMAG have also discussed how best to continue to engage with the Scientific Committee, in order to make best use of their expertise.

HMAG have continued to informally engage through consultation and comment on a number of documents for the scheme, including AMS and SSWSI. Since December 2021 HMAG have undertaken:

- 2 additional rounds of informal consultation on AMSs

- 2 additional rounds of informal consultation on SSWSIs
- Consultation has included 2 scoping meetings for the above documents

HMAG continue to engage with National Highways in the manner set out above through the full suite of documents. HMAG have also attended a virtual reality demonstration of the scheme in February 2022 and provided advice to assist in its refinement.

The Scientific Committee of independent specialists and experts continues to play a key role, advising HMAG, National Highways, and their archaeological contractor, Wessex Archaeology. The Scientific Committee continues to meet and has most recently actively contributed to development of archaeological technical strategies, research questions under the archaeological research agenda which informs the proposed approach to archaeological mitigation, as well as the Public Archaeology and Community Engagement (PACE) programme (as outlined in the State Party's 2022 State of Conservation Report in more detail). Members of the Scientific Committee maintain their independence and ability to express their personal opinions publicly. A copy of the Terms of Reference for the Scientific Committee is within Appendix D.

The Stakeholder Design Consultation Group (SDCG) has not provided any advice since the World Heritage Committee Meeting in July 2021 as no detailed design has been progressed following the quashing of the DCO. If the detailed design process recommences the group will be reconvened.

Relevant statements on the A303 improvement scheme during Examination

Historic England, Wiltshire Council, English Heritage Trust and the National Trust participated fully in the DCO process. Extracts from their DCO submissions are presented below; hyperlinks to the submissions cited are included.

Historic England

Historic England provided a '[Concluding Submission](#)' to the Examination. This sets out the organisation's position on the proposed A303 improvement scheme which remains unchanged.

In summary, Historic England believes the scheme has the potential to deliver significant benefits for the historic environment. By putting much of the current surface road into a bored tunnel, it would allow archaeological features within the WHS currently separated by the A303 trunk road to be appreciated as part of a reunited landscape and facilitate greater public access to this internationally important site. Historic England believes that the DCO, Outline Environmental Management Plan and Detailed Archaeological Mitigation Strategy include sufficient provisions to ensure that heritage considerations play an appropriate and important role in the construction, operation and maintenance of the scheme.

If consented, Historic England will continue to advise National Highways on the detail of the design and delivery of the scheme.

English Heritage Trust

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 it, 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 prehistoric environment in the process.

National Trust

The National Trust's position on the proposed A303 improvement scheme as set out in the Examination remains unchanged.

In summary the National Trust welcomes the State Party's intention to invest in a bored tunnel to remove much of the existing A303 from the Stonehenge WHS. And believes that, if designed and delivered with the utmost care for the surrounding archaeology and chalk grassland landscape, the Proposed Development could provide an overall benefit to the WHS. It could help to reunite the landscape providing improvements to monument setting, tranquillity and access for both people and wildlife.

If the Scheme is consented the National Trust will continue to provide advice to National Highways through its participation in the Heritage Monitoring and Advisory Group (HMAG), the Scientific Committee, and the Stakeholder Design and Consultation Group (SDCG).

Wiltshire Council

Wiltshire Council's [Closing Statement for Examination](#) set out the Council's assessment of the scheme against the four objectives set by the Department of Transport (DfT). It also considered whether the positive and negative impacts of the scheme remained as stated and assessed within the [Local Impact Report](#) at the end of the Examination. In summary, Wiltshire Council considered that the proposed scheme achieved the objectives as set by DfT and that the scheme would generate benefits in relation to transport, economic growth, cultural heritage and environment and community. The Council considered that the negative impacts of the scheme had been appropriately mitigated through provisions contained within the Draft Development Consent Order, Outline Environmental Management Plan, Detailed Archaeological Mitigation Strategy and the Council's Side

Agreement with National Highways, and will be subject to further consideration during the detailed design phase.

The Council was supportive of the scheme, and its associated Corridor improvements, and wished to see the scheme progress through to completion so that the identified benefits could be realised for the WHS, the residents of Wiltshire as well as the wider public.

Appendices

Appendix A – Advisory Mission Terms of Reference

Appendix B – Images from Virtual Reality model

Appendix C – HMAG Terms of Reference

Appendix D – Scientific Committee Terms of Reference

Annexure F. Previous Mission Findings

2.1 First Mission – October 2015

The first ICOMOS/UNESCO Advisory mission took place from 27 to 30 October 2015, at the request of the State Party, following the announcement by the UK Government in 2014. The mission report is available at [REDACTED]

At the time of the first mission, no precise plans existed regarding roads or tunnel portals, and the scheme was presented as a tunnel "at least 2.9 km long". This notion was reached on the basis of potential portal placements suggested by English Heritage (now English Heritage and Historic England) and the National Trust. The Mission particularly advised regarding processes, and its report recommended further exploration of options.

The first Mission concluded that:

. . . a well-considered and designed tunnel scheme could become a model of good practice on the world stage . . .

and

. . . the project for the relocation of the existing road underground into a "tunnel of at least 2.9k" could readily adopt appropriate well-established construction methods and spatial planning approaches. Hence, with good design and construction controls, and respecting essential archaeological and heritage management measures, the tunnelled length of the road would be expected to have a beneficial impact on the attributes of Outstanding Universal Value (OUV). However, the siting and design of the tunnel portals, approach cuttings/embankments, entry/exit ramps, mitigation measures and the temporary construction works have the potential to adversely impact OUV. These latter aspects of the scheme, in particular, will require rigorous investigation, evaluation, iterative design and assessment if they are to protect the attributes of OUV within the World Heritage site.

The above text has been quoted often in the period since, particularly following the Decision of the World Heritage Committee (41 COM 7B.56) which requested that the State Party re-consider the F10 option which would divert the A303 around the WHS. The first Mission did not endorse any particular tunnel solution and both the Mission and the State Party at the time consistently note that any tunnel would be 'at least' – not 'only' – 2.9 km long and that resolution of any tunnel design I (including alignment, design detail and length) was always to be subject to substantial further work.

The first Mission made a range of recommendations, which were summarised in the second mission report as follows:

- *Establish a heritage-centred steering mechanism between the Heritage bodies and including scientific experts, dealing with monitoring and MOU.*
- *Set up a role for further joint UNESCO/ICOMOS missions to advise on OUV protection and enhancement.*
- *Provide organogram of the SP actors involved.*
- *Include of best practices in technology for BIM and virtual visualisation.*
- *Ensure the involvement of Landscape architect.*

- *Align Heritage Impact Assessment (HIA) with the Development Consent Order (DCO) process.*
- *Undertake studies on visitor changes in numbers and behaviour.*
- *Review and implement international best practice for highway and tunnel design.*
- *Address issues of temporary construction and efficiency in logistics.*
- *Clarify and formalise relations between heritage bodies, as well as interactions between the developer and archaeological management. Ensure that heritage bodies are as vigorous and proactive as possible in defending heritage ad OUV, including in the context of commercial archaeology.*
- *Review elements of communication strategy.*

The current Mission has reviewed and concurs with the recommendations of the first Mission.

Nearly all of the above recommendations (and the more detailed sets of ‘priority’, ‘critical’ and ‘important’ recommendation from the first mission report) either have now been, or are in the process of being, implemented by the State Party and its agencies. Some matters, such as studies on visitor numbers and behaviours are still work-in-progress. The DCO and HIA alignment remains as a critical activity. However, the preparation of HIAs to inform the option selection was not undertaken as per ‘critical’ recommendation number 1. In the view of the current Mission, this may have contributed to the fact that the Outstanding Universal Value of the WHS does not appear to have been afforded at least equal priority to other environmental considerations, including impact on Areas of Natural Beauty and Special Conservation Areas, during the assessment and evaluation process for surface or tunnel options.

2.2 Second Mission – January/February 2017

The second ICOMOS/UNESCO Advisory mission took place between 31 January and 3 February 2017 and was also conducted at the invitation of the State Party. This mission had a more-focused remit and was particularly concerned with the proposed A303 Amesbury to Berwick Down Road Scheme and its potential impacts on the World Heritage property and its OUV:

The position along which the tunnelling will restore the visual integrity of one part of the Stonehenge WH property should be considered along with the consequential loss of physical integrity of the archaeological layers of the property which will be caused by the tunnel approach roads, as well as the loss by the public of direct visual access to Stonehenge, which might be perceived as a value for sharing this heritage, although not overtly part of its OUV. These are the issues that need to be assessed by HIAs, prepared in accordance with the applicable ICOMOS Guidance, and based on the best possible knowledge of the overall property in relation to its OUV, so that any impact on OUV can be clearly understood and assessed before any decisions are taken.

The second Mission advised that the SP and its organisations have been responsive to most recommendations of the first Mission. The current Mission concurs with that assessment.

The second Mission considered archaeological assessments, carried out at the corner of A303 / A360, as well as on the A303 in the area of the ‘Avenue’ and their influence on design decisions regarding possible placement of the western portal, should a tunnel option proceed, noting that results of research by Historic England were available to inform their archaeological strategy, but that questions remain on the calibration of the two inter-related research streams and that there were some problems with access to parts of the site.

The second Mission concluded that the evaluations and assessments considered through the mission process identified that an alternative route (the F10) would have a lesser impact on the OUV of the World Heritage property than the tunnel options then under consideration, and that the currently-proposed placement (option D061-62) would cause considerable damage to the OUV of the WHS, through adverse effects on the archaeological remains, on their landscape attributes, and on setting and visibility. The second Mission concluded that the western portal should be outside the WHS if a tunnel solution is pursued. The second Mission also recognised that the re-positioning of the eastern tunnel portal to the east of the 'Avenue', on-line on the current path of the A303 road but still within the WHS, would bring some benefits to the Stonehenge landscape, but concluded that that further refinements were needed.

The Mission noted that the governance and decision making processes were sophisticated, but concluded that the manner in which the criteria are being applied do not give enough weight to the heritage priority required for a World Heritage property, and specifically the preservation of its OUV, as required by the obligations of the State Party under the World Heritage Convention. The Mission took note of the creation of the Heritage Management Advisory Group (HMAG), but expressed concern that the Scientific Committee recommended by the first Mission had not been appointed.

The second Mission made a range of recommendations, which were summarised in the second mission report as follows:

6. *The Mission recommends that the F10 option be further explored as an alternative for further studies as it would have a significantly lesser impact on the OUV of the WH property than the tunnel options currently under consideration.*
7. *The Mission recommends that if the D061/D062 were still to be pursued as an option:*
 - *an extension of the tunnel should be considered so that the Western portal would be located outside the WH property to avoid its negative impacts on the OUV of the property, its landscape, monuments and archaeological richness, and the Western portal and associated approach road are located so that they would not pose any threat to the property or its setting;*
 - *if a longer tunnel is considered, the SP should undertake a comprehensive Heritage Impact Assessment, which addresses all attributes of OUV, including archaeological and landscape integrity, visibility and noise factors, and incorporating a landscape impact study focusing on the inter-visibility and visual envelopes (viewshed) of the Western portal and highway locations to determine the necessary length of the tunnel that will not harm the OUV of the property and its setting.*
 - *the location of the Eastern portal which is to be repositioned, on-line on the current path of the A303 road but to the east of the important prehistoric feature known as the 'Avenue', linking the Stonehenge monument to the river Avon, be further refined in order to ensure that potential impacts on OUV are avoided. A location closer to the Countess roundabout should be considered, especially with regards to approach routes and infrastructure during construction, (bearing in mind other archaeological features in the vicinity, including the Mesolithic Blick Mead and the Iron Age Vespasian's Camp).*
8. *The Mission recommends that the already constituted Heritage Monitoring Advisory Group, be immediately completed and strengthened with a fully operational "Scientific Committee".*
9. *The Mission recommends that a sustainable tourism strategy of presentation and promotion of the WH property be developed as soon as possible with the view 1) to frame*

the mitigation measures, such as the loss of direct visual access of Stonehenge Monument, into a wider context; 2) to ensure that the economic benefits related to the WH property are spread to the community and the wider county and 3) to ensure the lasting conservation of the site.

10. *The Mission recommends that the SP and bodies involved agree to set up an open forum, gathering stakeholders, local communities, civil society representatives, citizens and all interested parties, as a place to engage into a constructive dialogue driven by the overarching strategy of the Management Plan, i.e. “achieving the correct balance between conservation, access, the interest of the local community and the sustainable use of the Site”.*
11. *The Mission recommends that the project programme and the expectations of all major participants should be adjusted to align with the World Heritage Committee timeframe and process, through careful attention to the ‘triggers’ which instigate statutory timeframes and deadlines.*

Third Mission Date – March 2018

The Third Mission made the following findings:

The State Party and its agencies have responded to the recommendations of previous Advisory missions and Decisions of the World Heritage Committee (although some recommendations from the first mission and some requests of the Committee have not been implemented).

The Stonehenge component of the ‘Stonehenge, Avebury and Associated Sites’ property (the WHS), consists of the main henge monument in the centre of an open archaeological landscape of visually-interlinked monuments. Currently, the two-lane surface highway A303 cuts across this landscape from east to west for approximately 5.4km. Removal of the surface highway A303 from this landscape would have a positive effect on the WHS, and could deliver a range of legacy benefits.

The ‘Preferred Route’ for the enhanced A303 and current design proposal comprises a 2.9km twin tunnel, a short covered section, plus more than 2km of dual carriageway in cuttings with some land bridges. The tunnel would remove the road from the central part of the Stonehenge component of the WHS but the construction of four-lane highways in cuttings at either end of the tunnel would adversely and irreversibly impact on the integrity, authenticity and Outstanding Universal Value (OUV) of the WHS, through removal of archaeological features and deposits, through disrupting the spatial and visual links between monuments, and as a result of its overall visual impact.

A surface route, which re-routes the A303 completely around the Stonehenge component of the WHS, and enables the closure of the existing section of the A303 within the WHS, would provide the best option in relation to impact on the OUV of the WHS. The visual and physical impact on the landscape to the south of the property (an area of Natural Beauty and Special Conservation) of the F10 scheme option proposed would have been high. However, other surface routes may still be feasible, depending on the relative weighting accorded to matters that inform the decision.

Having regard to the first mission advice that:

. . . a well-considered and designed tunnel scheme could become a model of good practice on the world stage . . .

and

. . . the project for the relocation of the existing road underground into a “tunnel of at least 2.9k” could readily adopt appropriate well-established construction methods and spatial planning approaches. Hence, with good design and construction controls, and respecting essential archaeological and heritage management measures, the tunnelled length of the road would be expected to have a beneficial impact on the attributes of Outstanding Universal Value (OUV). However, the siting and design of the tunnel portals, approach cuttings/embankments, entry/exit ramps, mitigation measures and the temporary construction works have the potential to adversely impact OUV. These latter aspects of the scheme, in particular, will require rigorous investigation, evaluation, iterative design and assessment if they are to protect the attributes of OUV within the World Heritage site and the surrounding Archaeological Priority Area . . .

the ‘rigorous investigation, evaluation, iterative design and assessment’ process has revealed that, if the tunnel solution is pursued, a length of 2.9km would not be adequate to protect the integrity and conserve the OUV of the WHS.

Although the location of the western portal represents an improvement on previous options, it nevertheless involves an intrusive section of cut dual carriageway within the WHS. Therefore, if a tunnel solution is pursued, the western portal should be re-located outside the western boundary of the WHS to avoid dual carriageways within this part of the WHS.

The eastern portal has been positioned in the least impactful location available close to the WHS boundary, given the constraints imposed by the attributes of the WHS, other significant sites in the vicinity, and local topographic and environmental conditions. The location of the eastern portal to the east of The Avenue and its siting within a micro valley is an improvement on previous options. However, a tunnel portal much further to the east, completely outside the WHS, would protect the OUV of the property from the impact of associated dual carriageways. The Mission recognises that the State Party and its agencies have been methodical and thorough in the approach to determining the ‘Preferred Route’ and have been careful to have regard to the myriad of complex issues and pressures that affect both corridor and route selection and the assessment of potential benefits and costs. The Mission recognises that the State Party and its agencies must seek to balance a range of issues and factors. However, the Mission concludes that additional weight should be afforded to avoiding impact on WHS, in view of its Outstanding Universal Value and the obligations of the State Party under the *World Heritage Convention*. The Mission considers that the appropriate ‘test’ is not whether there is a net benefit to OUV, but rather how adverse impact on OUV can be avoided.

The OUV of the WHS should therefore be afforded at least equal priority to other environmental considerations, including impact on Areas of Natural Beauty and Special Conservation Areas, when either surface or tunnel options are being considered or assessed. In addition, the innovative economic modelling of the benefit-cost of the project should be refined to recognise that, insofar as the public is willing to pay to remove the A303 from the WHS, the public would presumably be willing to pay more to remove the impact completely through longer tunnel options or complete by-passing.

The Heritage Management Advisory Group and Scientific Committee are now established, functioning and providing advice that can facilitate a ‘heritage-centred’ approach and contribute to a proposed legacy benefits programme, which is yet to be developed by Highways England.

The independent website of the Scientific Committee is a welcome initiative and it is important that the Scientific Committee is able to express publicly opinions on any aspect of the project.

The Scientific Committee needs to be able to provide unfettered advice on any matter, including alternative route or construction options, and archaeological methodologies to be used during the project. To give effect to its independent expert status, the Scientific Committee should be at liberty to report directly to the Heritage Management Advisory Group and/or to the UK statutory heritage bodies. It is also important to ensure that the experience and skill set within the Scientific Committee itself should include all relevant expertise, including for example, experience in large-scale archaeological evaluation strategies for Neolithic and Bronze Age landscapes.

The methodology outlined in *Heritage Impact Assessment Scoping Report* (AECOM, Mace, February 2018) is appropriate. The Heritage Impact Assessment should have particular regard to the report "Stonehenge A303 improvements: outline assessment of the impacts on the Outstanding Universal Value of the World Heritage property of potential route options presented by Highways England for January 2017" carried out by N. Snashall & C. Young (Snashall & Young 2017), as well as their earlier 2014 report. The 2011 ICOMOS *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* should continue to guide Heritage Impact Assessment. This Guidance allows for positive impacts to be considered, but the relevant objective remains that there is no major adverse impact on OUV.

The archaeological investigations undertaken to date have accorded with the recommendations of previous missions, although analysis and reporting are yet to be completed. The *Archaeological Evaluation Strategy* (AECOM, Mace, WSP January 2018) and the *Overarching Written Scheme of Investigation for Archaeological Evaluation* (AECOM, Mace, WSP January 2018) provide a framework for archaeological investigations, in the event that a tunnel option is pursued. However, all archaeological processes should also continue to comply with expert advice provided by the Scientific Committee.

The Development Control Order (DCO) process (the equivalent of planning permission for infrastructure projects) and its programme and timing can and should be aligned with the World Heritage Committee timetable, as the State Party proposes to do. In the event that there are shifts in the project programme, these should not preclude the opportunity for World Heritage Committee Decisions to further influence the project and inform the consent authority decisions.

The mission findings and recommendations should be shared with the public and with all decision makers involved in the design and content of the project or the DCO process.

The third Advisory mission has been timely, and it would be appropriate for the process of Advisory missions to continue beyond the DCO application stage, as alternative plans are developed for this highly significant major project.

Specific responses to each of the items in the Terms of Reference for the Advisory mission are provided in the main body of the report.

The third Mission made the following recommendations:

1. Although the Preferred Route shows improvement compared with previous plans, and would also improve the current situation in the centre of the Stonehenge component of the WHS, it should not proceed in its current form.

2. Potential surface routes for the proposed dual carriageway sections of the A303 should be reconsidered outside the WHS, on the basis that Outstanding Universal Value (OUV) of the WHS should be afforded at least equal priority to other environmental considerations (including impact on Areas of Natural Beauty and Special Conservation Areas), and must include complete closure of the section of the A303 which runs through the WHS.
3. Economic modelling of route options, and particularly the ‘willingness to pay’ approach, should recognise that options which reduce impact on OUV (such as a longer tunnel or a complete by-pass of the WHS) may have greater community benefit than options which partially remove the surface road but have other adverse impacts on OUV.
4. If a longer tunnel is further considered, its design (as currently presented in the Preferred Route) must be substantially refined to ensure the OUV of the WHS is fully respected, and this refinement should take precedence over any predetermined project programme or deadline.
5. If a longer tunnel is further considered, the western portal should be relocated to the west of the western boundary of the WHS.
6. If a longer tunnel is further considered, the location of the eastern portal should be further considered with a view to relocating it well to the east of the Countess roundabout.
7. A sustainable tourism strategy should be prepared for the WHS in its entirety, including the Avebury component, addressing the implications of results from the previously-recommended studies on changes in visitor numbers and behaviour, and responding to the opportunities for new interpretation and visitor experience that would arise from the proposed scheme. This would also imply incorporating the WHS Avebury component presentation within the current exhibition at the Visitor Centre.
8. The Scientific Committee should be empowered to provide unfettered advice on any matter, including alternative route or construction options, the archaeological methodologies to be used during the project and its own membership, experience and skill set, and should be at liberty to report directly to the Heritage Management Advisory Group and UK statutory heritage bodies, not only to Highways England.
9. The impact of any further proposed schemes on the OUV of the WHS should be evaluated using the methodology outlined in the Heritage Impact Assessment Scope (AECOM, Mace, WSP February 2018), the 2017 and 2014 preliminary heritage impact assessments by Snashall & Young, and the 2011 ICOMOS *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*.
10. If a longer tunnel is considered, the HIA/EIA/DCO processes and assessments should include relevant expertise and adequate investigations to address factors such as life expectancy, end-of-working-life remediation, vibration and noise, which are particular to the tunnel solution.
11. The section of the current A303 which runs through the WHS could become a non- or limited vehicular thoroughfare after an improvement scheme has been completed that

removes the road from the WHS, but the proposed link between byways 11 and 12 should not be established.

12. A more broad-ranging community consultative process, which particularly includes the Avebury community, should be established to allow civil society to express their views, on an ongoing basis, about any aspect of the project, not only the legacy benefits being considered through the benefits and legacy forum process.
13. The legacy benefits package for the project should incorporate initiatives and programmes identified as desirable to conserve and/or interpret OUV in the Plan of Management for the WHS.
14. The timing and programme for the Development Consent Order process should be managed to allow for consideration of the conclusions and recommendations of this Advisory mission, any recommendations of the World Heritage Committee, and the time needed to explore further options.
15. Consultation with UNESCO World Heritage Centre and ICOMOS should continue for the life of the project, including, where appropriate, further Advisory missions once alternative options have been explored.

Annexure G World Heritage Committee Decisions 2017 - 2021

Decision 41 COM 7B.56

Decision 41 COM 7B.56, adopted by the World Heritage Committee at its 41st Session (Krakow, 2017), included, among other matters, the following items:

1. *Takes note with satisfaction of the management achievements, and progress with implementation of previous Committee Decisions, to address protection and management issues identified in the Statement of Outstanding Universal Value (OUV) for the property;*
2. *Commends the State Party for having invited two Advisory missions to advise on the process for determining and evaluating options for the proposed upgrading of the main A303 road across the property, as part of a wide major infrastructure project;*
3. *Expresses concern that the 2.9km Stonehenge tunnel options and their associated 2.2km of dual carriageway approach roads within the property that are under consideration, would impact adversely the OUV of the property;*
4. *Urges the State Party to explore further options with a view to avoiding impacts on the OUV of the property, including:*
 - a. *The F10 non-tunnel by-pass option to the south of the property,*
 - b. *Longer tunnel options to remove dual carriageway cuttings from the property and further detailed investigations regarding tunnel alignment and both east and west portal locations;*
5. *Encourages the State Party to address the findings and implement the recommendations of both Advisory missions and to invite further World Heritage Centre/ICOMOS Advisory missions to the property, to be financed by the State Party, in order to continue to facilitate progress towards an optimal solution for the widening of the A303 to ensure no adverse impact on the OUV of the property;*
6. *Requests the State Party to manage the timing of the consent and other statutory processes for the A303 trunk road project to ensure that the World Heritage Centre, ICOMOS and the World Heritage Committee can continue to contribute to the evaluation and decision-making processes at appropriate stages.*

Decision 42 COM 7B.32

Decision 42 COM 7B.32, adopted by the World Heritage Committee at its 42nd Session (Manama, 2018), included, among other matters, the following items:

7. *Commends the State Party for inviting three Advisory missions to advise on the proposed upgrading of the main A303 road, (which currently bisects the property), as part of a major infrastructure project;*
8. *Notes the additional investigations undertaken by the State Party to consider the southern surface (F10) by-pass route and alternative alignment and longer tunnel options to remove dual carriageway cuttings from the property, and further detailed investigations regarding tunnel alignment and both east and west portal locations;*
9. *Also notes the findings and recommendations of the 2018 Advisory mission, particularly that, although the current 'Proposed Scheme' shows improvement compared with previous plans and would also improve the situation in the centre of the property, the rigorous investigation, evaluation, iterative design and assessment process has revealed that, if the current length of*

tunnel solution is pursued, the damage inflicted by the dual carriageway cuttings would impact adversely on integrity and the Outstanding Universal Value (OUV) of the property, and therefore the proposed A303 upgrade project should not proceed with the current length of the tunnel;

10. *Notes with concern the impacts of the current design of the dual carriageway on the property, especially at the western end;*

11. *Urges the State Party to continue to explore further design refinement, with a view to avoiding impact on the OUV of the property, including longer tunnel options that do not require an open dual carriageway cutting within the property and to avoid impact due to noise, lighting and visibility; and urges furthermore, the State Party to minimize the length of the culvert part of the tunnel in order to reduce the impact on the cultural landscape and the archaeology;*

12. *Requests the State Party to address the findings and implement the recommendations of the March 2018 Advisory mission and encourages the State Party to continue to facilitate progress towards an optimal solution for the widening of the A303 with a view to avoiding adverse impact on the OUV of the property;*

13. *Further notes that the State Party has advised that it will manage the timing of the consent and other statutory processes for the A303 trunk road project to take into account Committee Decisions and to ensure that the World Heritage Centre, ICOMOS and the Committee can continue to contribute to the evaluation and decision-making processes at appropriate stages of the project;*

Decision 43 COM 7B.95

Decision 43 COM 7B.95, adopted by the World Heritage Committee at its 43rd Session (Baku, 2019), included, among other matters, the following items:

14. *Commends the State Party for the design refinements which have occurred to the A303 route Amesbury to Berwick Down upgrading project within the property, including an additional land bridge and longer covered section, as well as the proposed legacy benefits which have been incorporated within the project, and notes the additional investigations and assessments undertaken by the State Party to consider longer tunnel, further land bridge and cut-and-cover options and resulting alternative western portal locations;*

15. *Notes with concern, that although the current scheme, which is now subject to the Development Consent Order (DCO) examination process, shows improvement compared with previous plans, it retains substantial exposed dual carriageway sections, particularly those at the western end of the property, which would impact adversely on the Outstanding Universal Value (OUV) of the property, especially its integrity, and therefore encourages the State Party to not proceed with the A303 route upgrade for the section Amesbury to Berwick Down project in its current form;*

16. *Urges the State Party to continue to pursue design solutions which reduce further the impact on the cultural landscape and OUV of the property through longer tunnel sections, so that the western portal is located outside the property boundary;*

17. *Requests the State Party to ensure that this present World Heritage Committee Decision (43 COM 7B.95) is conveyed to the Planning Inspectorate, to other decision-makers, to known stakeholders and to the wider community through the DCO online exhibition, and that mechanisms are put in place to ensure that the World Heritage Centre, ICOMOS International and the World Heritage Committee continue reviewing and assessing the design plans at the appropriate stages of the project, in conformity with the Operational Guidelines;*

Decision 44 COM 7B.61

Decision 44 COM 7B.61, adopted by the World Heritage Committee at its 41st Session (Fuzhou, 2021), included, among other matters, the following items:

18. *Further notes the small-scale design refinements, which have been made to the A303 improvement scheme within the property;*
19. *Recalls that the Committee has previously noted that the 2018 joint World Heritage Centre/ICOMOS Advisory mission and the State Party's own Heritage Impact Assessment (HIA) highlight that the current overall proposal would impact the integrity of the intended spatial relationships between monuments, a key part of the prehistoric 'landscape without parallel' as inscribed;*
20. *Reiterates its concern that, as previously advised by the Committee and identified in the 2018 mission report, the part of the A303 improvement scheme within the property retains substantial exposed dual carriageway sections, particularly those at the western end of the property, which would impact adversely the Outstanding Universal Value (OUV) of the property, especially affecting its integrity;*
21. *Notes with concern that, although consideration was given to extending the bored tunnel and to greater covering of the cutting, as requested by the Committee, it was determined by the State Party that the additional benefits of a longer tunnel would not justify the additional costs;*
22. *Reiterates its previous request that the State Party should not proceed with the A303 route upgrade for the section between Amesbury and Berwick Down in its current form, and considers that the scheme should be modified to deliver the best available outcome for the OUV of the property;*
23. *Notes furthermore the State Party's commitment to ongoing engagement with the Committee, the World Heritage Centre, and ICOMOS, but also considers that it is unclear what might be achieved by further engagement unless and until the design is fundamentally amended;*
24. *Regrets that the Development Consent Order (DCO) has been granted for the scheme; and therefore, further considers in conformity with Paragraph 179 of the Operational Guidelines that the approved A303 improvement scheme is a potential threat to the property, which - if implemented - could have deleterious effects on its inherent characteristics, notably to its integrity;*
25. *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;*