

A303 Amesbury to Berwick Down
Secretary of State's Re-determination of the Application for Development Consent
Representation by ICOMOS-UK

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Background

1. The Secretary of State, in his letter of 24th February 2022, requested the applicant, National Highways (NH), to address the following issues relating to the impact of the A303 project on the Stonehenge, Avebury and Associated Sites World Heritage site (WHS):
 - 1) *Whether four assets identified by Consortium of Stonehenge Experts were included in the NH's assessments*
 - 2) *Basis for NH's Conclusions on alternative routes*
 - 3) *NH's response to matters raised by ICOMOS-UK and other organisations*
 - 4) *Provision of biodiversity baseline surveys and reports and issues relating to adverse impacts of tunnelling through chalk bedrock*
 - 5) *Environmental Statement on heritage matters*
 - 6) *Newly assessed assets*

In a letter of 13th July 2022, the Department for Transport, on behalf of the Secretary of State, requested interested parties to comment on the responses to issues provided by NH. ICOMOS-UK would like to comment on NH's response to the first three issues.

Issue 1: Whether four assets identified by Consortium of Stonehenge Experts were included in the NH's assessments

2. The four sites mentioned by the Consortium of Stonehenge experts include a large Beaker-period settlement with burials. This is wholly within the WHS and partly in the area of the proposed Western cutting. The site is of great significance for its relationship to the ceremonial landscape, as it extends towards the Beaker cemetery barrow at the north end of the Winterbourne Stoke barrow group, and it is inter-visible with the Wilsford 2b Beaker barrow at the western end of the Normanton Down barrow group. Furthermore, it is likely to have been contemporary with construction stages three and four of the main henge monument, and might have been where the communities who built these stages lived. This highly important site, which in our view contributes strongly to the Outstanding Universal Value (OUV) of the WHS, also offers the possibility of revealing much further evidence on the evolution of the Stonehenge landscape.
3. NH have stated in their response that this large Baker period settlement with associated burials was not provided with an asset number, as, although it is clearly spatially related to other Beaker Barrows and clearly linked to development stages of Stonehenge, it was not

considered to be of equivalent significance to Scheduled Ancient Monuments or to be of National importance, and thus did not contribute to OUV. As a result it was not considered in relation to potential impact on OUV.

4. The current DCO Scheme would slice through the northern part of this Beaker period site with some 57,000 sq. m of it being bulldozed for the Western Approach road. While the limited sifting proposed might salvage a very small portion of finds, such a process cannot be said to rescue or record its full significance, which is related not just to what it contains but to its contribution to the overall Stonehenge ceremonial landscape and its social structures, as has been revealed by work over the last twenty years.
5. In ICOMOS-UK's view, the HIA undertaken should have considered not just Scheduled Ancient Monuments and monuments of National importance, but the whole integrated prehistoric landscape, in which case whether or not sites were scheduled would have been irrelevant, as it is the spatially related network of sites that underpins the OUV of the property. The current response by NH has highlighted the inadequacy of the HIA process in being focused mainly on discrete sites of national importance rather than on the overall prehistoric landscape.
6. The identification of assets of value has been an issue since the very first meeting to discuss improvements to the A303 that was held in Taunton. Then, a map of the route was shown that include AONBs but not the WHS. When this was queried, the response was that WHS were not recognised as entities in the planning system. Since then progress has been made with the recognition of WHSs in planning terms, but even if that had not been the case, the obligation of the World Heritage Convention should have been a constraint to be acknowledged at the very start of the road design process. That it was not, is still clearly evident as the approach taken by NH maintains a focus on the scheduled monuments, and particularly the main henge monument, rather than on the overall WHS as an asset made up of an integrated network of sites.
7. As has been clearly stressed by ICOMOS-UK and others parties during the Public Hearings and since, the World Heritage site must be considered as an entity, and moreover as a cultural landscape entity, rather than as an ensemble of specifically protected monuments. The OUV clearly highlights this landscape without parallel, within which are spatially related sites and clusters of sites, some scheduled but many others not.
8. Recent research and survey work over the past two decades has reinforced the idea of a prehistoric landscape densely populated with evidence not just of ceremonial structures but related settlements and burials. It is the WHS as a whole that should be considered as a discrete asset, not just some of its component parts.
9. In conclusion, the response by NH shows no change to its assessment of the importance of the Beaker period site in the line of the Western approach road. NH is still firmly of the opinion that this site is not of national importance and does not contribute to OUV. ICOMOS-UK cannot support the logic of this response, given the many reports that have been written on the importance of this Beaker site and its further archaeological potential. In our view, whether designated or not, the site, is a crucial part of the network of prehistoric sites related to the main henge monument, and has the capacity to provide much further evidence in the future, particularly related to communities and their lives. Such evidence will not be realised by bulldozing and limited sifting.
10. Furthermore, we would like to emphasise that the omission of this site from assets that support OUV, means that impact on it arising from the DCO Scheme and the Cut and Cover tunnel has not been considered.

11. We have similar concerns over the lack of acknowledgment of the value of the other three sites in relation to the OUV of the WHS. These are: the remains of a probable Early Neolithic settlement west of the Beaker-period settlement and the remains of a probable Early Neolithic settlement at the eastern portal, both of which would be wholly or partially destroyed by the DCO Scheme; and the remains of a Mesolithic settlement at Blick Mead which could be destroyed by changes in the water table.

Issue 2: Basis for NH's Conclusions on alternative routes

12. NH's response provided further details on a lengthened Bored Tunnel, and a Cut and Cover tunnel extension of the DCO Scheme. ICOMOS-UK welcomes the attention that has now been directed at possible options for avoiding or minimising impact on OUV.
13. It considers that the option of a Cut and Cover tunnel cannot be supported as it would have an even higher highly adverse impact on OUV than the DCO Scheme, in terms of irreversible damage to important archaeological sites, including the Beaker settlement and burial sites, and severe negative impact on the integrity of the property and its OUV.
14. For the longer Bored Tunnel, NH states that this option is presented as an initial draft scheme that has not been worked up to the same level of detail as for the shorter DCO Scheme tunnel. It has also been designed almost entirely within the DCO boundaries. This means that the site of the proposed Western portal is 80 metres from the WHS boundary, rather than approximately 600 metres away as had been intimated previously for such an extension. This closer alignment is said to reflect the need for a different configuration for the new junction. At the Eastern end, it is difficult to interpret quite what is proposed on the basis of the information so far provided.
15. For the western end, the arrangements suggested in this draft scheme are not ideal as the location of the Western portal lies cuts into a ridge and on which the Winterbourne barrows are aligned. For the eastern end, more details would need to be provided to assess impact. But as this proposal is acknowledged as a first draft scheme, we consider that necessary improvements could be made if the scheme were to be refined and extended beyond the DCO boundary.
16. This scheme clearly delivers benefits, but we do not consider that the benefits set out in the outline HIA are complete. The HIA is based on assessing impacts 'on Asset Groups and individual heritage assets expressing Attributes of OUV', and thus has the same weaknesses as earlier HIAs. This is evident in the list of benefits seen to be delivered by the longer tunnel. These relate to the Winterbourne Stoke Crossroads Barrows (AG12), The Diamond Group (AG13) and the Normanton Down Barrows (AG19). But they ignore the key benefit resulting from the absence of a cutting in the western part of the WHS which is that the Beaker settlements and burials and other archaeological would not be obliterated and nor would be overall property be severed. Thus the overall benefits of this longer tunnel (if modified) is that its impact on OUV could be slight.
17. NH's conclusion on the longer bored tunnel is that it is moderate beneficial – that is in comparison to what are seen as the highly negative impacts on OUV of the current A303. Using the same methodology, the DCO Scheme was considered by NH to be slightly beneficial. NH then further considered whether the difference between moderate beneficial and slight beneficial can be justified by the extra cost of the longer tunnel. In our view this methodology is flawed as it does not take into account that the adverse impacts of the current A303 can all be reversed, while the highly adverse impacts of the proposed cuttings for the DCO Scheme are permanent and irreversible.

18. ICOMOS-UK agrees that there are adverse impacts of the current road, as does the World Heritage Committee, but these can be almost all eliminated either by a longer tunnel or an alternative route for the road. We do not agree that the DCO scheme is beneficial in comparison with the existing road when it would result in such extensive destruction of archaeological sites that contribute to OUV: on the other hand we consider that the benefits arising from the longer tunnel have been underestimated.
19. Ultimately, what needs to be considered is impact on OUV for each of the options. In our view, the comparative outcomes of the various options in relation to impact on OUV should be follows:
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| Current A303 | Adverse, but reversible, impact on OUV |
| DCO Scheme | Highly adverse, irreversible impact on OUV |
| Cut and Cover scheme | Highly adverse, irreversible impact on OUV |
| Longer Bored Tunnel: | Potential for minor adverse impact on OUV, if modified. |
20. In summary, on the basis of the draft scheme presented for the longer Bored Tunnel, it would appear that it could have the potential to offer minor adverse impact on OUV, if suitable amendments were made. By comparison, the DCO Scheme has very high adverse impacts on OUV, as acknowledged by the Inspectors and the World Heritage Committee, in respect of its irreversible destruction of archaeological sites and thus its impact on the OUV, including integrity, of the WHS.
21. In conclusion, ICOMOS-UK considers that the longer Bored Tunnel, if further improved with regards to the precise length and siting of portals, could have the potential to deliver a scheme that has minor adverse impact on OUV.

Issue 3: NH's response to matters raised by ICOMOS-UK and other organisations

22. In our response submitted in April 2022, we raised the issues of the credibility of evidence provided for other land route alternatives and particularly for the Southern Route. Notwithstanding that the Southern Route alternative appeared to have a most preferential outcome - that is no adverse impact on OUV, much lower construction costs and apparently less than severe environmental impacts – we noted that no HIA had been undertaken and nor had the rationale for abandoning this route been satisfactorily set out.
23. NH has not addressed these points.
24. ICOMOS-UK remains concerned that an alternative, apparently far cheaper land route has not been explored to a degree that would allow a supportable decision to be made. Moreover no possibility of a land route being combined with a short tunnel outside the WHS has been considered.
25. NH states that the investigative work it has undertaken on the longer Bored Tunnel combined with an outline HIA has provided sufficient evidence for a robust decision to be made. We consider that Southern Route should have been explored to a similar level so as to allow a similar robust decision to be made.
26. We re-iterate that ICOMOS Guidance on Impact Assessment for Cultural Heritage Property sets out clearly the necessity to consider alternative development proposals, as well as the one that triggered the initial assessment, in order to ascertain whether other approaches might be found that could avoid adverse impact on OUV. This approach has now been included formally in the Operational Guidelines. But it should also be noted that assessing alternatives is also an established part of EIAs, as acknowledged in the High Court ruling which referred to a breach both in relation to the World Heritage Convention and common law.
27. ICOMOS-UK remains concerned that at a time of financial stringency and high fuel prices, combined with the need to reduce carbon footprints that should in time reduce road traffic,

more attention has not been paid to alternatives solutions apart from a longer tunnel, and in particular that investigative work for the Southern Route has not been undertaken to the same standard as applied to the longer tunnel, which, as NH acknowledges, is necessary to allow for a robust decision to be made.

13th August 2022