

28th September 2022

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Your ref: TR010025 AFP022
Our ref: SoS Response Letter
28.09.22

[REDACTED]

Planning Act 2008 (as amended and the Infrastructure Planning (Examination Procedure Rules 2010 – the A303 (Amesbury to Berwick Down) Development Consent Order

[REDACTED] **Parties**

[REDACTED] er 2022 inviting comment from all Interested Parties on the National Highways response to the Secretary of State's letter dated 26th August 2022 and on the Final Report of the joint World Heritage Centre / ICOMOS / ICCROM Advisory Mission to Stonehenge, Avebury and Associated Sites (c.373bis) 19-21 April 2022 as part of the re-determination process for the A303 Amesbury to Berwick Down (Stonehenge) road improvement scheme (the Scheme).

Wiltshire Council has reviewed the material and wishes to make the following comments and observations.

Wiltshire Council welcomes the Final Report of the joint World Heritage Centre / ICOMOS / ICCROM Advisory Mission to Stonehenge, Avebury and Associated Sites, which was undertaken between 19-21 April 2022. The Council welcomes the acknowledgement within the report of the enhancements and improvements to the Scheme since the 2018 Advisory Mission and the recognition that the State Party has put in place a number of excellent measures and practices in its approach to the development of the Scheme. The Council also acknowledges the concerns and challenges that are raised in the report in relation to the Scheme.

It is considered that the Final Report of the 2022 Advisory Mission contains comprehensive findings and recommendations; many of which echo statements made in the previous Advisory Mission reports in 2015, 2017 and 2018. The Council notes the National Highways response and agrees that the existing draft Development Consent Order (DCO) and its associated strategies, plans and governance arrangements would enable a number of the recommendations (recommendations 6, 7, 9, 11, 12 and 14) to be addressed. Similarly, the Council considers that recommendations 15 and 16 could be addressed as part of the detailed design of the scheme (if consented), building on the mechanisms and

commitments already contained within the draft DCO and its associated documentation. However, the Council considers that recommendation 10, which recommends that appropriate community access should be provided to Blick Mead, Vespasian's Camp, The Avenue and Amesbury Park, might be difficult to implement within the scope of the Scheme, given the private land ownership and Scheme boundary constraints and sensitivities. The Council also recognises that there may be additional challenges given the scope of the Scheme if the State Party were to address all of the recommendations.

Wiltshire Council notes the Advisory Mission's ongoing concerns regarding the western portal and its approach. The Council has also identified the need for the Scheme to further mitigate the negative impacts at the western end of the Scheme. In the Council's '*Closing Statement for Examination*'¹, in paragraph 2.17 of that submission, the Council stated: "In summary, the Council considers that the most significant impact arising from the Scheme is the loss of World Heritage through the removal of the A303 from the immediate vicinity of the western end and the eastern part of the WHS. The negative impacts are concentrated at the western end of the Scheme which require mitigation at detailed design stage. The Council welcomes the National Highways statement that: "The provisions contained within the draft DCO, which include consultation and collaboration with heritage bodies on design matters, allow for refinement of the DCO Scheme to ensure that the Scheme does not cause adverse impacts or maximise beneficial impacts. The Council will continue to work with National Highways to explore potential modifications and design enhancements to ensure that these concerns are adequately addressed."

Furthermore, it has been noted that the previous commitment by National Highways for ongoing "engagement, consultation and collaboration with the WHC, the UNESCO World Heritage Centre and its advisory bodies in regard to the Scheme and its impact on the OUV of the WHS...The Applicant expects that the detailed design process (subject to redetermination of the Scheme) will provide an opportunity to address as many of UNESCO's concerns as possible." (paragraph 1.2.12 of National Highway's '*Response to Bullet Point Five – Any Other Matters*'²) has not been referred to in the National Highways response to the 2022 Advisory Mission Report. Wiltshire Council would expect that opportunities for ongoing engagement with the WHC, the UNESCO World Heritage Centre and its advisory bodies would be actively explored as the Scheme is further developed.

On a more general matter, the Council would like to reiterate a point made in its previous (4th April 2022) submission³ regarding the weight to be placed on the World Heritage Committee (WHC) decisions. In section 2.5.1 of that submission, the Council requested that the Secretary of State considers the views of the WHC, whilst not being determinative in nature, as both "relevant and important" in line with the position adopted by the Examining Authority at the close of the Examination. As the Examining Authority also considered that this stance would equally apply to the ICOMOS mission reports, Wiltshire Council requests that the Secretary of State takes a similar approach in the weight to be given to consideration of the 2022 Advisory Mission report.

¹ [TR010025-001737-Wiltshire Council.pdf \(planninginspectorate.gov.uk\)](#)

² [HE551506-AMW-GEN-ZZ ZZ ZZ-RP-IM-6000731 \(planninginspectorate.gov.uk\)](#)

³ [Wiltshire Council.pdf \(planninginspectorate.gov.uk\)](#)

Finally, it is recognised that the Secretary of State will need to consider and balance the benefits and impacts of the Scheme as a whole on the World Heritage Site, its Outstanding Universal Value as well as on other receptors in line with relevant legislation when determining whether consent for the Scheme should be granted.

I trust that the information above is helpful for the Secretary of State when considering the re-determination of the Application. However, if you require any further information, please do not hesitate to contact me.

Yours sincerely,



Parvis Khansari
Corporate Director – Place

