

ENGLISH
HERITAGE

Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR
By EMAIL ONLY: A303Stonehenge@planninginspectorate.gov.uk

28th September 2022

Dear Mr O'Hanlon

Reference: Planning Act 2008 (as amended) and the Infrastructure Planning
(Examination Procedure) Rules 2010

Application by National Highways for an Order granting Development Consent for
the construction of a new two-lane dual carriage way for the A303 between
Amesbury and Berwick Down in Wiltshire.

Re: REQUEST FOR ADDITIONAL COMMENTS FROM ALL INTERESTED PARTIES

Re: The responses by the Applicant to the Secretary of State's consultation letter of
9th September 2022

English Heritage Trust ("EHT") welcomes the invitation in your letter of 14th
September 2022 to comment on the further information that National Highways
("NH") provided to the Secretary of State ("SoS") in response to the report from
the recent UNESCO mission.

Stonehenge was inscribed as a World Heritage site ("WHS") in 1986 as it is one of
the most important prehistoric landscapes in the world, but for far too long the
WHS has been cut in two by a major road. Placing the road within a buried tunnel
will reunite the ancient landscape and allow everyone to understand and experience
Stonehenge better. People will at last be able to explore the wider countryside
surrounding the stones, including all its many other fascinating prehistoric
monuments.

In terms of commenting on the Applicant's responses to the request by the SoS to
comment on the UNESCO mission report, EHT will be doing so as one of the major
leaseholders and heritage managers in the WHS.

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Table 1 Findings

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.

EHT are satisfied that NH have provided sufficient information regarding the requirements of the National Policy Statement for National Networks (“NPSNN”) to answer the points raised by UNESCO.

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

EHT have reviewed all the documents to date that NH have produced in terms of alternatives mentioned in their response to this finding. However, we have noted in our most recent response to the questions posed on 20th June 2022 (Ref 08 09 22 letter) that the extended bored tunnel, which we were recently given more information about by NH, would overall be moderate beneficial to the OUV of the WHS in comparison to the current scheme which is only slight beneficial.

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.

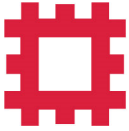
EHT notes that NH considers that:

the views of the WHC should be treated as the views of a consultee, to be given appropriate weight by a decision maker.

Table 2 Responses to the recommendations in Section 3.3 of the Report



1. EHT notes that UNESCO urge the SoS to comply with the decisions of the World Heritage Committee.
2. UNESCO urge NH to revisit surface options if the scheme does not go ahead. EHT would agree with NH that all surface options have been explored previously. EHT also understand and endorse NH's position that it is not possible to have full Heritage Impact Assessments for every possible route, but that the assessment that was carried out which informed the current scheme, was thoroughly explored.
3. EHT notes that the western portal is not acceptable to UNESCO without amendment. EHT also note that the Bored Tunnel extension which NH assessed recently (following the UNESCO Mission) shows as a slightly more beneficial result overall than the current scheme.
4. UNESCO made an explicit recommendation to extend the tunnel at the western end. EHT notes, however that NH concluded that the additional benefit derived from this action is outweighed by the cost.
5. EHT agrees with UNESCO that the barrow cemetery at Winterbourne Stoke must be protected if the western portal was moved further west.
6. EHT is content that the programme for 'archaeological salvage' is already in place.
7. EHT is content that protocols for dealing with 'unexpected finds' is in place.
8. As per point 5 above, EHT notes the importance of the protection of the Winterbourne Stoke barrow - other considerations here are outside EHT's remit (i.e. outside the WHS).
9. EHT are satisfied that the Ground Water Management Plan will protect the site at Blick Mead if it is affected by the scheme, which it should not be.
10. The community access discussed here is outside EHT's remit.
11. The Scientific Committee is already fully engaged with the scheme and will continue to be if the scheme is consented. EHT are represented on the Scientific Committee as a member of the Heritage Monitoring Advisory Group ("HMAG").
12. EHT agree with UNESCO's suggestion that representation on HMAG should be augmented.
13. This matter is outside EHT's remit.
14. EHT agrees that works compounds should not be located within the WHS.



15. EHT agrees that the lighting scheme must be appropriate for the protection of the night sky over Stonehenge.
16. EHT has already been consulted on matters relating to signage in the WHS and will continue to contribute if the scheme is consented.
17. EHT notes that DCMS has discharged this recommendation.
18. This matter is outside the remit of EHT.
19. This matter is outside the remit of EHT.
20. EHT notes that NH are reluctant to wait for the delayed 2022 meeting of the World Heritage Committee for a decision to be taken following this technical report.
21. This matter is outside the remit of EHT.
22. This matter is outside the remit of EHT.

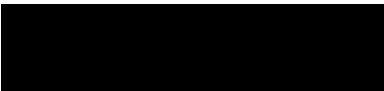
Conclusion

EHT has been part of the iterative process of the development of the current scheme not least as members of the HMAG and members of the Scientific Committee. EHT also hosted part of the fourth UNESCO Advisory Mission which is the subject of the recent report and which, it is hoped will assist NH and the Department for Transport in their decision making.

EHT welcomed the constructive report from UNESCO. This scheme has been – and continues to be – scrutinised by UNESCO, Historic England, Wiltshire Council, EHT, National Trust, numerous archaeologists, and the scheme's own independent Scientific Committee. It is because of this involvement that the scheme has undergone significant improvements.

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

Yours sincerely,



Kate Mavor

Chief Executive, English Heritage

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