



Historic England

**SUBMISSION
ON BEHALF OF THE
HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND
(HISTORIC ENGLAND)**

**Re-determination of the Application by Highways England for an Order granting
Development Consent for the A303 Amesbury to Berwick Down (“A303
Stonehenge”) PINS Reference No: TR010025**

28th September 2022



1. Introduction

- 1.1. Historic England is the government's statutory adviser on all matters relating to the historic environment in England. It is our duty under the provisions of the National Heritage Act 1983 (as amended) to secure the preservation and enhancement of the historic environment. Historic England is also the government's statutory advisor on relevant international conventions that apply across the UK, including the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (World Heritage Convention).
- 1.2. On August 26th 2022, the Secretary of State published a letter inviting comment from National Highways 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 – hereafter referred to as the Advisory Mission Report. National Highways provided a single submission in response on the 9th September 2022. The Secretary of State subsequently invited comments from all interested parties on the information provided by National Highways and the Advisory Mission Report, in his letter of the 14th September 2022.
- 1.3. This submission from Historic England responds to both the Advisory Mission Report and National Highway's response dated 9th September 2022. It should be read in the context of previous submissions made by Historic England.

2. Historic England's observations on the Advisory Mission Report and National Highways' response dated 9th September 2022

- 2.1. Historic England welcomes the publication of the Advisory Mission Report, including its recognition that removal of the surface highway from the Stonehenge landscape would have a positive impact on the World Heritage Site (WHS) and the Outstanding Universal Value (OUV) of the inscribed property. The report rightly notes that the Stonehenge component of the property is an incomparable archaeological landscape of interlinked monuments, both standing and subterranean. We also welcome the report's recognition of the willing and regular cooperation between different agencies and sectors, most significantly those related to transport and culture, as well as the methodical and detailed analysis that has informed the development of the Scheme subject of this DCO application.
- 2.2. A number of the Advisory Mission Report recommendations relate to the need for a comprehensive archaeological salvage and mitigation programme consistent with best practice, including robust mechanisms to deal with unexpected archaeological finds (recommendations 6 and 7). We welcome these recommendations given the international importance of the Stonehenge landscape, and consider that there are already appropriate provisions within the draft DCO and Detailed Archaeological Mitigation Strategy (DAMS) to address these. The Secretary of State will be aware, as noted in our concluding submission to the Examination (October 2019), that we welcomed National Highway's positive engagement with our

advice and recommendations on the DAMS. We remain confident that the DAMS, underpinned by a series of Scheme specific research questions, will ensure an understanding of the OUV of the WHS and the significance of the historic environment overall will guide decision making and maximise opportunities to further understand this exceptional landscape.

2.3. We are also pleased that the Advisory Mission Report recognises the value that heritage expertise has and will continue to bring to the Scheme, particularly through the well-established Heritage Monitoring and Advisory Group (HMAG) and Scientific Committee (recommendations 11 and 12). As National Highways rightly note in their submission of the 9th September, provision is made within the DAMS for the ongoing engagement of the Scientific Committee. The Committee's terms of reference also clearly set out its engagement at each phase of the Scheme. With regards to the Advisory Mission's recommendation that HMAG should be further augmented to include cultural landscape conservation, management and interpretation expertise, Historic England notes that HMAG membership is made up of organisations rather than individuals. This means that each member can bring or channel the expertise required from its respective organisation, including extensive expertise in cultural landscapes. Likewise, the Stakeholder Design Consultation Group allows for a diverse range of specialisms to be called upon as appropriate.

2.4. Historic England notes that several of the Advisory Mission Report recommendations relate to more detailed considerations of Scheme implementation or design (e.g. recommendations 14, 15 and 16). This includes details relating to the location of temporary activities such as construction compounds, lighting arrangements for the tunnel and surface of the WHS, and signage. We are confident in the provisions in the draft DCO and Outline Environmental Management Plan (OEMP) to address these recommendations. For example, there will be no construction compounds within the WHS, as secured under the OEMP and Construction Environmental Management Plans. Additional provisions are also secured within the Heritage Management Plans and Archaeological Method Statements. We note that National Highways outline these provisions in more detail in their submission dated 9th September. The OEMP also includes a series of design commitments, which cover issues such as lighting, and which will guide discussions and decisions during the detailed design phase of the Scheme. As outlined in our Concluding Submission to the Examination (October 2019), we consider that the incorporation of a design vision, commitments and principles in the OEMP, together with arrangements for consultation and engagement with Historic England, provides sufficient safeguards for the detailed design stage.

2.5. We note, however, that the Advisory Mission Report expresses concerns about the Scheme's impact on the OUV of the WHS, and the need to demonstrate where possible that harm has been avoided or appropriately minimised. More specifically, the report expresses concerns about the western end of the Scheme, including the location of the tunnel portal and the length of associated dual carriageway in open cutting (recommendations 2, 3, 4, 5 and 8). We note that in relation to these

concerns National Highways in their response state 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 opportunities identified with potential to minimise adverse impacts or maximise beneficial impacts on the WHS are acted upon”. Historic England will work with them to this end.

2.6. Our objective throughout the Scheme’s examination as part of the determination process, has been to ensure that the historic environment, including the WHS element, is fully and properly taken into account. It is our role to respond to the draft DCO and to do our best to ensure that in its final version it appropriately recognises the unparalleled landscape of the WHS, and Historic England has consistently sought to achieve this. We consider that there are appropriate provisions and safeguards in the DCO overall for the protection of the historic environment, including through the further detailed design of the Scheme. As such, and as outlined in our Concluding Submission to the Examination, we can be more confident of the Scheme’s potential to deliver benefits for the historic environment.

2.7. If consented, we will continue to advise National Highways on the detail of the design and delivery of the Scheme. This will help to ensure that impacts on OUV are minimised and that the potential benefits for the historic environment are delivered in practice. However, as we’ve noted in our submissions previously, it will be for the Secretary of State to determine whether the present Scheme is the best available on the evidence that has been submitted.

3. Conclusion

3.1. In line with recommendation 17, the Advisory Mission Report has been shared in a timely manner with all parties and individuals who may be involved in decision-making or implementation of the Scheme. It is now for the Secretary of State to take the report into account in their redetermination of the DCO.

3.2. Should the Secretary of State have any additional queries in relation to our response, we would be pleased to continue to offer our assistance.