

**Highways England: A303 Amesbury to Berwick Down  
Project, Development Consent Order Application**

**Scheme Reference: TR010025**

**Written Representation on Principal Issue 9**

**Heritage and the Historic Environment**

**for**

**The Stonehenge Alliance (Reference No. 2001870)**

**by Kate Fielden**

*NOTE ON THIS ARCHIVED EDITION*

*The footnotes in the original submission to the Examining Authority used links to documents published on the Planning Inspectorate. Since these are not permanent, the documents have been uploaded to the Stonehenge Alliance website and re-linked.*

*Other redundant links have been updated. 12 March 2026*

## Summary

1. This submission covers two closely linked bullet points under the Examining Authority's Principal Issue 9.
2. Consideration of the **“assessment of “the significance of affected heritage assets and their settings, including any contribution they make to the OUV of the WHS”**, starts by examining the terms “conservation” and “Outstanding Universal Value” (OUV) of the World Heritage Site (WHS). The means by which Government's obligations to ensure that conservation of the WHS and other affected heritage assets is undertaken to sustain OUV are highlighted, along with the failure of the Scheme to meet those requirements.
3. Heritage assets affected by the Scheme that are attributes of OUV were included in Highways England's Heritage Impact Assessment (HIA) which followed ICOMOS' methodology but we show that, in our view, the HIA fails on three counts:
  - i) in its baseline assessment of the current impact of the A303 on the WHS; ii)
  - in the balancing of effects of the Scheme on attributes of OUV; and
  - iii) in inadequate assessment of effects of the Scheme on the WHS itself, a heritage asset of the highest significance and designated as of OUV.
4. Heritage assets (and their significance) affected by the Scheme that are not attributes of OUV are also considered, along with the potential impacts of the Scheme on them.
5. The second matter covered is **“The overall effect, taking proposed mitigation into account, that the scheme would have on the OUV of the WHS having regard to the UNESCO/ ICOMOS Final Report and Decisions on the joint World Heritage Centre/ICOMOS Advisory mission.”** The character of the WHS as a part-designed ritual/cultural landscape is contrasted with the HIA approach which tends to separate the WHS into component parts. The advice of the 2018 Advisory Mission and WH Committee Decision are considered in the light of the Scheme application which disregards that advice and reveals a serious error in understanding concerning cut-and-cover tunnelling. The DDCMS' 2019 State of Conservation Report similarly misunderstood the Decision of the 2018 WH Committee.
6. Non-compliance of the Scheme in respect of protective planning policy and guidance, the WHS Management Plan, international conventions, and European and national legislation for the historic environment and archaeology is set out in our Written Representation on Alternatives. These considerations include the Government's commitments to protect, conserve and sustain designated and historic landscapes and archaeology, including the WHS.

**Kate Fielden**, BA, D.Phil., is Honorary Secretary to the Stonehenge Alliance, Vice Chairman of RESCUE, The British Archaeological Trust and a Trustee of CPRE Wiltshire Branch. Her qualifications are in archaeology. She was Editor of the *Wiltshire Archaeological & Natural History Magazine* (1988–98).

A member of the Avebury and Stonehenge Archaeological and Historical Research Group, Dr Fielden also represents the Avebury Society on the Avebury WHS Steering Committee. She has worked as a volunteer for CPRE Wiltshire for some 30 years and taken the case at Public Inquiries into planning proposals at Avebury and Stonehenge. She has worked on the production and at public examination of planning documents, including relevant Local Plans, since the late 1980s, appearing for CPRE and the Avebury Society at the Wiltshire Core Strategy EIP, helping to achieve stronger policies and texts for the WHS and the historic and natural environments. She has taken part in production of all the relevant WHS Management Plans to date as representative for CPRE and/or the Avebury Society. She attended the DfT's A303/A30/A358 Corridor Feasibility Study Group meetings in 2014 for CPRE Wiltshire Branch.

## **1. Assessment of the significance of affected heritage assets and their settings including any contribution that they make to the Outstanding Universal Value (OUV) of the WHS.**

### **Introduction**

*“Highways England has worked closely with the heritage stakeholders (Historic England, English Heritage, the National Trust and Wiltshire Council) to develop a scheme which will conserve and enhance the WHS and maintain its Outstanding Universal Value for future generations.”<sup>1</sup>*

Such statements as this appear numerous times in the DCO application documents. Inaccurate and misleading in the context of what is proposed, they must be challenged, not only for their veracity but also for what is meant by conservation of the WHS and maintaining its OUV.

### **1.1. Conservation**

1.1.1. Dictionary meanings for “conserve” or “conservation”, generally include the words “preserve” or “preservation”. The OED gives “*to keep in safety, or from harm, decay or loss; now usually, to preserve in its existing state from destruction or change.*” The online Oxford Dictionaries give as the meaning for “conservation” in relation to the historic environment: “*Preservation and repair of archaeological, historical, and cultural sites and artefacts.*”

---

<sup>1</sup> Highways England, “Case for the Scheme and NPS Accordance”, DCO APP-294. 7.1, Introduction, p.VI. <https://stonehengealliance.org.uk/wp-content/uploads/2026/02/FN01-TR010025-000447-7-1-Case-for-the-Scheme.pdf>

1.1.2. Under Article 4 of the World Heritage Convention our Government is committed to “*identification, protection, conservation, presentation and transmission to future generations*” of its WHSs.<sup>2</sup>

1.1.3. The A303 Scheme would neither protect nor conserve the WHS; nor would it meet the Government’s obligations under the World Heritage Convention.

## **1.2. Outstanding Universal Value**

1.2.1. Outstanding Universal Value (OUV) is defined by UNESCO as:

*“cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity.”*<sup>3</sup>

1.2.2. UNESCO guidelines set out the ten criteria upon one or more of which the decision that a property is of OUV is to be based.<sup>4</sup> The World Heritage Convention makes clear that OUV in relation to WHSs is understood to apply *overall* to properties meeting criteria of the highest cultural or natural importance to mankind.<sup>5</sup>

1.2.3. OUV is an intangible concept. Nothing in a WHS is of OUV apart from the designated WHS property. It has become common practice to regard protection of OUV to be synonymous with protection of the WHS and it would certainly be erroneous to separate the two from each other. UNESCO’s guidelines state that

*“Protection and management of World Heritage properties should ensure that their OUV . . . [is] sustained or enhanced over time.”*<sup>6</sup>

1.2.4. The Convention (Articles 1–4) requires each State Party to ‘identify and delineate’ its *properties* considered to be of OUV and that it is the *property* that must be conserved and protected.

1.2.5. The OUV of the Stonehenge, Avebury and Associated Sites WHS was fixed at the time of designation in 1986. For designation of WHSs nowadays,

---

<sup>2</sup> UNESCO. 1972. *Convention concerning the Protection of the World Cultural and Natural Heritage*. HMSO publication Treaty Series no.2 (1985).

<http://whc.unesco.org/en/conventiontext/>

<sup>3</sup> UNESCO, 2017. *Operational Guidelines for the implementation of the World Heritage Convention*. UNESCO World Heritage Centre, Paris. July 2017, para.49.

<http://whc.unesco.org/en/guidelines/>

<sup>4</sup> *Ibid.*, paras.77–78.

<sup>5</sup> UNESCO, *op. cit.*, 1972, Preamble and Articles 1–4.

<sup>6</sup> UNESCO *op. cit.*, 2017, para. 96

*“To be deemed of Outstanding Universal Value, a property must also meet the conditions of integrity and/or authenticity and must have an adequate protection and management system to ensure its safeguarding”.*<sup>7</sup>

1.2.6. UNESCO’s Operational Guidelines state that

*“The delineation of boundaries is an essential requirement in the establishment of effective protection of nominated properties. Boundaries should be drawn to incorporate all the attributes that convey the Outstanding Universal Value and to ensure the integrity and/or authenticity of the property.”*<sup>8</sup>

1.2.7. UNESCO explains that

*“At the time of inscription of a property on the World Heritage List, the [World Heritage] Committee adopts a Statement of Outstanding Universal Value (see paragraph 154) which will be the key reference for the future effective protection and management of the property.”*<sup>9</sup>

1.2.8. A retrospective Statement of OUV (SoOUV) for the Stonehenge, Avebury and Associated Sites WHS was agreed by UNESCO in 2013.<sup>10</sup> It describes the Site and the criteria for its inscription and includes statements of Integrity and Authenticity. An account is given of how the property is protected and managed to ensure its safeguarding. The SoOUV is followed by a list of the Site’s “attributes of OUV”: tangible and intangible elements and qualities derived from the criteria for which the WHS is recognized to be of OUV.<sup>11</sup>

1.2.9. UNESCO’s Operational Guidelines explain that it is attributes of OUV that “convey” the OUV of a World Heritage property.<sup>12</sup> None of the attributes is of OUV in itself; it is only *together* that they give the WHS its OUV significance.<sup>13</sup> Monuments and sites like many of those seen in the Stonehenge and Avebury WHS are found elsewhere in Britain; it is not individual features of the WHS that are of OUV but their remarkable ensemble, termed in the Statement of OUV as a “landscape without parallel”. Along with the duty of protection of the WHS itself, particular care must therefore be taken to protect its attributes of OUV.

---

<sup>7</sup> *Ibid.*, para. 78

<sup>8</sup> *Ibid.*, para. 99

<sup>9</sup> *Ibid.*, para. 51

<sup>10</sup> Simmonds, S., & B. Thomas, *The Stonehenge, Avebury and Associated Sites WHS Management Plan*, 2015, pp.26ff. [http://www.stonehengeandaveburywhs.org/assets/2015-MANAGEMENT-PLAN\\_LOW-RES.pdf](http://www.stonehengeandaveburywhs.org/assets/2015-MANAGEMENT-PLAN_LOW-RES.pdf)

<sup>11</sup> *Ibid.*, p.32

<sup>12</sup> UNESCO, *op. cit.*, 2017, para. 99

<sup>13</sup> *Ibid.*, para. 88

### **1.3. Attributes of OUV of the WHS that are heritage assets and the WHS which is both a heritage asset and of OUV**

1.3.1. Designated heritage assets (scheduled monuments) and non-designated heritage assets are among the attributes of OUV of the WHS. The WHS itself is of OUV as well as being a designated asset of the highest significance.<sup>14</sup> Heritage assets that are attributes of OUV are the Stonehenge monument and the visible and hidden (below ground) physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites. All these heritage assets contribute to the OUV of the WHS; all of them in combination represent the OUV of the WHS. It is not only their physical remains that are attributes of OUV but also the siting of the funerary and ceremonial monuments in relation to the landscape, the skies and astronomy; their interrelationships with one another; their disposition, along with related sites and monuments of the period, which together form a “landscape without parallel”; and the evident influence of their remains and landscape settings on individuals of successive generations.<sup>15</sup>

1.3.2. In its HIA of the impacts of the A303 scheme on the OUV of the WHS, Highways England has followed ICOMOS’ guidance.<sup>16</sup> Essentially, the method assesses impacts on attributes of OUV in order to assess impact on the OUV of the WHS. The “Purpose” of the guidance includes the statement:

*“The World Heritage Convention is ratified by States Parties, who agree to conserve properties on their territories that are seen to be of OUV, and thus contribute towards protecting the shared heritage of humanity. This means that OUV needs to be sustained over time through the protection of attributes that are seen to convey OUV.”<sup>17</sup>*

1.3.3. The OUV of the WHS comprises all the attributes of OUV within the designated boundary. We could question many of the individual values given in assessments of impacts on attributes of OUV in Highways England’s HIA but the overriding consideration is the significance of the attributes as elements of the OUV of the WHS which demands their conservation and protection so that the WHS itself and its OUV may be conserved and protected.

---

<sup>14</sup> MHGLG, NPPF, 2019, para. 194.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>15</sup> Simmonds and Thomas, *op. cit.*, pp.32–4

<sup>16</sup> ICOMOS, *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*, 2011. [https://www.icomos.org/world\\_heritage/HIA\\_20110201.pdf](https://www.icomos.org/world_heritage/HIA_20110201.pdf)

NOTE 3 Mar 2026: This link has moved see

[https://publ.icomos.org/publicomos/jlbSai?html=Bur&base=technica&ref=41623&file=262.pdf&path=Guidance\\_on\\_heritage\\_impact\\_assessments.pdf](https://publ.icomos.org/publicomos/jlbSai?html=Bur&base=technica&ref=41623&file=262.pdf&path=Guidance_on_heritage_impact_assessments.pdf)

<sup>17</sup> *Ibid.*, “Purpose”, p.3.

1.3.4. Highways England’s HIA of the impacts on the OUV of the WHS, in following the ICOMOS method, has in our view failed fundamentally on three grounds:

- 1) in its baseline assessment of the current impact of the A303;
- 2) in the balancing of effects of the Scheme on attributes of OUV; and
- 3) in inadequate assessment of effects of the Scheme on the WHS itself.

#### 1.3.4.1. The current impact of the A303

Highways England says that

*“Assessment takes account of the present-day baseline (the ‘do-nothing scenario’), including the presence of the existing A303 in the landscape.”*<sup>18</sup>

Notwithstanding the difficulty in understanding precisely what comprises Highways England’s ‘baseline’, it is clear that strong emphasis is placed on the current impact of the A303 on the WHS. The HIA demonstrates that impacts of the scheme on monument groups as attributes of OUV affected by the scheme were assessed against the baseline, particularly in respect of the A303, although we don’t know exactly what weight was given to the ‘do nothing scenario’ in measuring and/or balancing impacts.

It is important, however, to consider precisely what it is about the A303 that gives it such adverse prominence in the baseline assessment. Highways England asserts that

*“The existing A303 is assessed as currently having an adverse effect on the OUV of the WHS. This effect is highlighted in the nomination documents and all three WHS Management Plans. The Scheme aims to address Management Plan objectives regarding the removal of the existing road.”*<sup>19</sup>

Adverse impact of the A303 on the OUV of the WHS is not mentioned in either the nomination document or the Management Plan although, in the Statement of OUV, it is said that

*“The presence of busy main roads going through the World Heritage property impacts adversely on its integrity.”*<sup>20</sup>

This conclusion may have arisen through interpretation of the final criterion (c) for integrity as set out in UNESCO’s Operational Guidelines:

---

<sup>18</sup> Highways England, DCO APP-195. 6.3 Environmental Statement Appendix 6.1 - Heritage Impact Assessment, p. 116, para. 5.10.17. [https://stonehengealliance.org.uk/wp-content/uploads/2026/03/FN18-TR010025-000348-6-3\\_ES-Appendix\\_6.1\\_HIA.pdf](https://stonehengealliance.org.uk/wp-content/uploads/2026/03/FN18-TR010025-000348-6-3_ES-Appendix_6.1_HIA.pdf)

<sup>19</sup> *Ibid.*, p.90, para. 5.4.4

<sup>20</sup> Simmonds and Thomas, *op. cit.*, p.27

*“Examining the conditions of integrity, therefore requires assessing the extent to which the property . . . c) suffers from adverse effects of development and/or neglect.”*<sup>21</sup>

There has been no development of the A303 since 1986 when the WHS was designated as being of OUV. It is presumably the development of *increased traffic* on the A303 that has an adverse effect on the enjoyment of the WHS.<sup>22</sup> The A303 is very much a part of the designated WHS landscape and many drivers value views of the WHS from it.

It is widely understood that the “re-routing of road” raised in the nomination document refers to the A344. The presence of “busy main roads” going through the WHS is noted in the 2013 Statement of Integrity with particular emphasis given to the A344 at Stonehenge and the A4 and, by inference, the A4361 at Avebury.

The Management Plan does not have an objective to remove the existing A303, but rather to reduce its impact (principally in relation to traffic) on the WHS.

In any event, Highways England does not propose removing the A303 from the WHS but only the sight of traffic from part of it, along with introducing a new highway alongside the A303 for much of its length, leaving the redundant section clearly visible as a major feature across the landscape. Addressing the problem of traffic does not need to involve construction of a new road – nor one on the scale proposed across the WHS.

#### 1.3.4.2. **The balancing of effects of the Scheme on attributes of OUV**

Adverse and positive impacts on attributes of OUV were balanced by Highways England to reach an “overall” view of the impact of the Scheme on the OUV of the WHS, whereas ICOMOS advises, in relation to any balancing, only that

*“it may be necessary to balance **the public benefit** of the proposed change against the harm to the place. In the case of WH properties this balance is crucial.”*<sup>23</sup> (Our emphasis.)

The 2018 UNESCO/ICOMOS advisory mission implied that the balancing exercise employed by Highways England is incorrect, saying that

*“. . . the appropriate ‘test’ is not whether there is a net benefit to OUV, but rather how adverse impact on OUV can be avoided.”*<sup>24</sup>

---

<sup>21</sup> UNESCO, *op. cit.*, 2017, para. 88

<sup>22</sup> See, e.g., Simmonds & Thomas, *op. cit.*, p. 35, para. 2.3.28.

<sup>23</sup> ICOMOS, *op.cit.*, p. 11, para 6-2

<sup>24</sup> UNESCO WH Centre and ICOMOS, Final Report on the joint World Heritage Centre / ICOMOS Advisory mission to Stonehenge, Avebury and Associated Sites (c.373bis) 5 – 7 March 2018, “Findings”, p.7. <https://whc.unesco.org/en/documents/168265/>

### 1.3.4.3. Assessment of effect of the Scheme on the WHS

No separate examination appears to have been undertaken of the scale and severity of the physical, visual and other impacts of the scheme on the WHS itself and its setting (the “landscape without parallel”). Bearing in mind that the WHS is a heritage asset of the highest significance, planning policy demands an exceptionally high level of protection.<sup>25</sup>

The closest we appear to get to an HIA of the impacts of the Scheme on the WHS itself is in the HIA assessment, under the heading “Impacts and effects on attributes of OUV”,

“[Attribute] 6. *The disposition, physical remains and settings of the key Neolithic and Bronze Age funerary, ceremonial and other monuments and sites of the period, which together form a landscape without parallel.*”<sup>26</sup>

The assessment under this heading considers the impacts of the scheme, both beneficial and adverse, on affected individual heritage assets within the WHS: monuments, monument groups and features, and their settings. Avoiding direct impact on major known concentrations of archaeological remains but adversely affecting the settings of some, the beneficial effects were found to slightly outweigh the adverse effects of the Scheme for this attribute, with a balanced view that there would be a “slight beneficial effect” on OUV overall.<sup>27</sup>

It isn’t certain, in this context, how far ICOMOS’ pertinent advice was followed:

*“In the process of identifying direct impacts care must be taken of the development technique of gaining approvals by just avoiding direct impact - impacts which just “miss” physical resources can be just as negative to a single resource, a pattern, ensemble, setting, spirit of place etc.”*<sup>28</sup>

Highways England does refer to ICOMOS’ advice that

*“Proposals should be tested against existing policy frameworks and the management plan for the property and surrounding area”*<sup>29</sup>

but fails to follow this advice in relation to protective policies for the WHS, including those in the Management Plan.

1.3.5. UNESCO’s Operational guidelines remind us that

*“Legislative and regulatory measures at national and local levels should assure the protection of the property from social, economic and other pressures or changes that*

---

<sup>25</sup> NPPF, para.194b

<sup>26</sup> Highways England, *op. cit.*, (HIA) p.604. *See fn18*

<sup>27</sup> *Ibid.*, p.604, paras. 9.3.34–37

<sup>28</sup> ICOMOS, *op. cit.*, p. 8, para 5-3

<sup>29</sup> Highways England, *op. cit.* (HIA), p.32, with ref. to ICOMOS, *op. cit.*, p.10, para. 5-11

*might negatively impact the Outstanding Universal Value, including the integrity and/or authenticity of the property. States Parties should also assure the full and effective implementation of such measures.”<sup>30</sup>*

1.3.6. UNESCO and UK planning guidance and policy on WHSs place emphasis on the protection not only of the Site but also of its setting.<sup>31</sup>

1.3.7. Unlike WHSs nominated nowadays, the Stonehenge WHS has no buffer zone for which “A clear explanation of how the buffer zone protects the property should also be provided.”<sup>32</sup> Nevertheless, Government assures us that

*“England protects its World Heritage Sites and their settings, including any buffer zones or equivalent, through the statutory designation process and through the planning system”.*<sup>33</sup>

**1.3.8. Please see our Written Representation on Alternatives, for discussion of the protective planning policy and guidance for the WHS, the WHS Management Plan, and relevant international conventions, European and national legislation.** These considerations include commitments to protect, conserve and sustain designated and historic landscapes and archaeology, and WHSs.

#### ***1.4. Heritage assets that are not OUV attributes but would be adversely affected by the Scheme***

1.4.1. Non-designated archaeological heritage assets affected by the Scheme include the outstandingly important Mesolithic Blick Mead, the setting of which would be adversely affected by the planned Countess flyover. The flyover would be constructed partly alongside the excavated site areas but the full extent of the site is unknown: it might lie along the river bank under the present A303 embankment and into the valley beyond it. If so, the flyover would be constructed right over part of it, potentially impacting on the archaeology through compression and, if employed, piling.

1.4.2. In view of the obvious importance of Blick Mead, there might be a case at some time in the future (following consultation) to be made for extension of the periods covered by the WHS designation to include the Mesolithic.

1.4.3. The proposed Countess flyover and widened cutting for new dual carriageways would impact on the immediate setting of a number of designated heritage assets.

---

<sup>30</sup> UNESCO, *op. cit.*, 2017, para. 98

<sup>31</sup> E.g., UNESCO, *op. cit.*, 2017, para. 104; and MHCLG, “Conserving and Enhancing the Historic Environment”, online planning guidance, para. 032 Reference ID: 2a-032-20140306. <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#WorldHeritage-Sites>

<sup>32</sup> UNESCO, *op. cit.*, 2017, para.105

<sup>33</sup> MHCLG, *online planning guidance*, paragraph: 026 Reference ID: 18a-026-20140306

1.4.4. Grade I Listed Amesbury Abbey, its Grade II\* Listed garden structures, and Grade II\* Registered park and garden are designated heritage assets of the highest significance where NPPF para 194 applies:

*“any harm to or loss of the significance of a designated heritage asset (. . . from development within its setting), should require clear and convincing justification.”*  
[Substantial harm to] *“grade I and II\* listed buildings, grade I and II\* registered parks and gardens . . . “should be wholly exceptional”.*<sup>34</sup>

1.4.5. The setting of Vespasian’s Camp in the Grade II\* Amesbury Abbey Registered park and garden, an important 18thC garden viewing point and archaeologically significant as a scheduled monument (an Iron Age hillfort with remains of earlier barrows), would be further compromised by the visual impact of new (and older) road engineering, including tunnel portals. It can be assumed that there were intended 18thC views southeastward of the garden and parkland, also north and westward to King Barrow Ridge and the “Nile Clumps”. These views could be restored should the tree cover be removed at some future time.

1.4.6. NPPF Policy 194 similarly applies in the case of the settings of Grade II Listed Countess Farmhouse and barns which would be affected by the proximity of the flyover, the noise of traffic, and vehicle lights at night, creating a wholly incongruous and inharmonious backdrop to these buildings. The provision of greater access to the WHS for visitors would help to spread the footfall on the monuments and increase choices, as suggested in the Management Plan.<sup>35</sup> If, for example, the National Trust were to consider development of the barns at some future time to provide an additional visitor-access point to the WHS, the flyover would be likely to blight any visitor’s experience of the WHS on arrival and departure.

1.4.7. Section 66 of the Planning (Listed Buildings and Conservation Areas Act) 1990<sup>36</sup> ought to apply in the decision-making process in relation to the setting of the Listed buildings, also the setting of the Amesbury Conservation Area bordered by the flyover and widened dual carriageway. The expectation in the case of the Conservation Area is that development affecting it will preserve or enhance its character but the Scheme would obviously achieve neither of these aims.

1.4.8. Of some interest and already interrupted and damaged by the A303 Amesbury bypass, are the Nile Clumps of Beeches. Originally part of the Amesbury Abbey parkland, they are said to have been planted to represent French and English ships in battle to commemorate Nelson’s victory at the Battle of the Nile in 1798. Notwithstanding doubts about the validity of the commemoration (the trees may have been planted before 1798), they have importance as local landmarks and have undergone restoration in recent years with the help of Amesbury

---

<sup>34</sup> NPPF, para. 194 and 194b.

<sup>35</sup> Simmonds & Thomas, *op. cit.*, e.g., p.128, Policy 4a and Action 68

<sup>36</sup> Planning (Listed Buildings and Conservation Areas Act) 1990.  
<https://www.legislation.gov.uk/ukpga/1990/9/section66>

residents, the National Trust and CPRE Wiltshire. The clumps would be further compromised by new dual carriageways passing between them to the east tunnel portals.

1.4.9. To the west of the WHS, in the area of the proposed new Longbarrow Interchange, there would be major intrusions on the WHS from road engineering in its setting, both during construction of the Scheme (including the works compound and haul routes) and operation. No images have been produced of what these very extensive works would look like. The Scheduled prehistoric boundary monument SE of the present Longbarrow Roundabout apparently continues (unscheduled) northwestward, beyond the roundabout, through an area where a Bronze Age settlement is already compromised and partially destroyed by road engineering. The Scheme would cut through the (unscheduled) part of the boundary monument and further compromise the BA settlement remains. The Winterbourne Stoke barrow group extends west of the A360, close to the proposed construction compound and link road. The approach to the WHS for visitors by road from the east or west would give them little or no indication of the significance of the WHS.

1.4.10. We have not been given locations for traffic lights planned at the new interchange – whether they would be visible from the WHS by day or night – or as different coloured glows along with headlights angled upward on the slip roads in the darkness. It appears that bunding would be employed to mask the bridge over the Expressway, creating an incongruous new earthen ‘monument’ in the WHS landscape setting.

## **2. The overall effect, taking proposed mitigation into account, that the scheme would have on the OUV of the WHS having regard to the UNESCO/ ICOMOS Final Report and Decisions on the joint World Heritage Centre/ICOMOS Advisory mission.**

2.1. The OUV of a WHS is inseparable from the WH property.

2.2. The A303 Scheme with its tunnel over only part of the WHS would produce twin tunnel portals exiting into wide and deep cuttings through the “landscape without parallel”, leading to massive grade separated junctions at its boundaries. In terms of physical impacts alone, this would result in major reconfiguration of substantial parts of the WHS leaving it not only with irreparable damage to and major modification of the present archaeological landscape and its setting but also adding another modern highway scar across the WHS which would remain as a dominant and incongruous feature in the archaeological record, compromising enjoyment and understanding of the WHS by future generations. There would be a devastating impact on the exceptional character of the WHS landscape and its setting that the “mitigation” proposed would be absolutely unable to disguise. These permanent impacts would be visible within the WHS, including from key viewpoints such as barrows in the western part of the WHS and (overlooking the great scars of two dual carriageways) the ancient Avenue and Vespasian’s Camp in the east.

2.3. Historic England explains that

*“The historic character of a place is the group of qualities derived from its past uses that make it distinctive. This may include: its associations with people, now and through time; its visual aspects; and the features, materials, and spaces associated with its history, including its original configuration and subsequent losses and changes. Character is a broad concept, often used in relation to entire historic areas and landscapes, to which heritage assets and their settings may contribute.”<sup>37</sup>*

This is how the Stonehenge WHS should be seen and understood: not simply a collection of individual or groups of historic assets or OUV attributes and their settings but a unique landscape that retains a visible and invisible palimpsest of prehistoric (and later) activity within it – but of exceptional interest for the remarkable survival of its prehistoric remains.

- 2.4. What we know of the WHS today can be considered, in part, as a probably ritualistic designed landscape. Deliberately constructed elements – many intended to be inter-visible – were emphasised by use of the topography. Neolithic long barrows in the western part of the WHS are grouped around the head of a dry valley in which the enigmatic Wilsford Shaft appears to have been used well into the Bronze Age and later. Bronze Age barrows are set on ridges and slopes, respecting earlier monuments. Stonehenge itself has gone through multiple phases of construction, its location apparently carefully chosen to maximise the effects of distant, disappearing and closer views of the monument and an arresting skyline silhouette in certain approaches. The Stonehenge Avenue, like those at Durrington Walls and Avebury, connects the henge through the landscape to water. The Stonehenge Avenue, about half of it out of sight from the Stones, rose gradually from the Avon, with views across to the imposing heights of Vespasian’s camp, before turning west on King Barrow Ridge for the first glimpse of the henge.
- 2.5. We are beginning to learn more about the WHS with modern investigative techniques, such as the work undertaken by the Stonehenge Landscape and Stonehenge Riverside Projects, as well as the Stonehenge Landscapes Project<sup>38</sup> the results of which are still undergoing analysis. Anthropological analogies, such as Lynne Kelly’s work on the memories of special places and journeys, like those recalled in Australian Aboriginal song lines,<sup>39</sup> may also have relevance to understanding of the Stonehenge landscape. The astronomical significance of Stonehenge is recognised, but there are indications that movement through the landscape may have had meaning for those who journeyed

---

<sup>37</sup> Historic England, Advice Note on The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), December 2017, p.3.

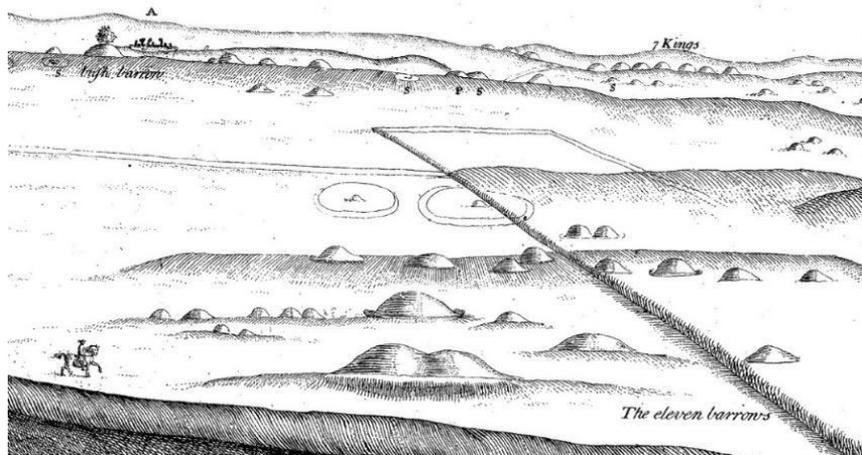
<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritageassets/heag180-gpa3-setting-heritage-assets/>

<sup>38</sup> See Simmonds and Thomas, *op.cit.*, under OUV attribute 3. “The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the landscape”, pp.36 and 53 (with illustration)

<sup>39</sup> Kelly, L., *The Memory Code: Unlocking the Secrets of the Lives of the Ancients and the Power of the Human Mind*, London: Atlantic Books, 2017.

towards the henge: that commemorative structures passed on the way were recognized by those observing the lie of the land and changing views of the monuments, perhaps already known or visualized through oral tradition. Although we may never know the full history of man's intentions for and use of this landscape, its importance is internationally recognised and safeguards have been put in place to protect it and its setting. Large-scale intervention of the kind now proposed would destroy not only parts of what we know about and experience of the WHS today but also potentially significant but yet unknown tangible and intangible elements of the place that had purpose and meaning for those who lived, worked and came to visit here.

- 2.6. We have suggested that the Examining Authority might walk through the landscape to the henge from Byway 12, starting at the south end of Lake Field, close to Stukeley's early 18thC viewpoint, to gain an idea of designed elements of the landscape with barrows on the ridges and the distant goal of the Stones, warmly pale in the sunlight. A similar walk, down Byway 12 from the north (Larkhill) would give the ExA a contrasting view of the Stones, looming and dark on the skyline. Did such approaches and the changing seasonal, diurnal and nocturnal light once have special meaning?



William Stukeley, A Prospect of the barrows in Lake Field . . . Engraving, 1723. A = Stonehenge. View northwards across the Stonehenge landscape unobscured by trees. Byway 12 now runs to the L of Bush Barrow, towards the henge.

- 2.7. In view of our understanding of the significance and character of the WHS as a cultural landscape<sup>40</sup> that embraces, within its setting, views to and from it, the balancing of assessed impacts on attributes of OUV by Highways England has led to erroneous conclusions.

Following examination of direct and indirect impacts, largely on grouped attributes of OUV and their settings – but not on the WHS itself, Highways England has arrived at an assessment of

<sup>40</sup> Simmonds and Thomas, *op.cit.*, para.2.2.3, pp. 17–18

“*Slight Beneficial*” effect on the Integrity of the WHS as a whole, and a *Slight Beneficial* effect on the Authenticity of the WHS as a whole. Overall the scheme is assessed to have a slight beneficial effect on the OUV of the WHS as a whole.’<sup>41</sup>

2.8. As mentioned earlier, however, the 2018 Advisory Mission pointed out 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 [sic], 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.”<sup>42</sup>

2.9. **Conspicuously missing within the HIA is an account and assessment of the physical impacts of the scheme on the fabric and setting of the WHS itself – a heritage asset of the highest significance, for which the safeguards in policy, planning and legal constraints are both paramount and legion. The aim of the Scheme should have been to ensure no adverse effects on the WHS, its OUV, authenticity, integrity and setting, such that might have been achieved with a much longer tunnel or a WHS bypass as recommended by the 2018 Advisory Mission and WH Committee Decision.**

2.10. As the 2018 Advisory Mission found, the proposed 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, particularly through disrupting the spatial and visual links between monuments, and as a result of its overall visual impact.”<sup>43</sup>

2.11. Highways England admits that there would be a “**major change in the landscape**” of the WHS<sup>44</sup> (our emphasis) but says:

“Although the Scheme would introduce **substantial elements of new infrastructure** within the WHS the location and design of this has been carefully developed to limit intrusion in the landscape in order to protect the WHS and its OUV.”<sup>45</sup> (Our emphasis)

---

<sup>41</sup> Highways England, *op. cit.*, (HIA See fn18) Conclusions box, p.35.

<sup>42</sup> UNESCO WH Centre and ICOMOS, Final Report on the joint World Heritage Centre / ICOMOS Advisory mission to Stonehenge, Avebury and Associated Sites (c.373bis) 5 – 7 March 2018, “Findings”, p.7. <https://whc.unesco.org/en/documents/168265/>

<sup>43</sup> *Ibid.*, p.6

<sup>44</sup> Highways England, DCO APP-195 (HIA), p.634, para. 12.6.4

<sup>45</sup> Highways England, *op.cit.* (HIA), p.34.

And accepts that there would be adverse effects on some attributes of OUV:

*“Slight Adverse effects would be experienced by physical archaeological remains (Attribute 2). There would be Slight Adverse effects upon the siting of monuments in relation to the landscape (Attribute 3) due to the positioning of new cuttings within the WHS (western and eastern approach roads and portals), which avoid known archaeological remains that contribute to the OUV of the WHS, but partially introduce new severance and impacts on the setting of assets and Asset Groups that contribute to OUV”*<sup>46</sup>

It is suggested, contrary to the advice of the Advisory Mission and without giving good reasons, that

*“none of these effects are deemed significant overall, and they would not erode the OUV of the WHS, its Integrity or Authenticity.”*<sup>47</sup>

It is impossible to take such conclusions seriously in view of the scale of the intervention proposed and the international advice given.

2.12. Informed by an international specialists’ report, The World Heritage Committee urged the UK Government in July 2018 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; and 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.”*<sup>48</sup>

This urgent advice has not been followed.

2.13. The DDCMS’ (February 2019) State of Conservation Report (SoCR)<sup>49</sup>

---

<sup>46</sup> *Ibid.*, p. 632, para.12.4.3

<sup>47</sup> *Ibid.*, p. 634, para.12.5.7

<sup>48</sup> UNESCO World Heritage Committee Decision 42 COM 7B.32, 2018, Item 7.

<https://whc.unesco.org/en/decisions/7261>

<sup>49</sup> Department for Digital, Culture and Sport, State of Conservation Report for the Stonehenge, Avebury and Associated Sites World Heritage Site, 1 February 2019.

<https://whc.unesco.org/en/documents/171631>

*“provides updated information on the proposed A303 improvement within the WH property, including changes made to protect and transmit the OUV of the property through the scheme design and associated mechanisms.”*

The SoCR *“updates the Committee on changes made to the evolving A303 trunk road proposals in response to the 2018 WH Committee decision, the technical advice of the March 2018 Advisory Mission report and the previous Committee decisions and advisory mission reports.”*<sup>50</sup>

The changes made to the road scheme would, however, evidently not *“protect and transmit the OUV of the property”*; nor do they follow key elements of the 2018 World Heritage Committee Decision.

2.14. The DDCMS says, concerning Items 1–7 of the Committee’s Decision:

*“This part of the Committee’s decision was instrumental in ensuring that the Department for Transport agreed, in July 2018, to additional mitigation measures that were the subject of supplementary public consultation following receipt of the 2018 mission report. These measures relate specifically to the ‘green’ land bridge at the western end of the World Heritage property which has been extended from 50m to 150m in length to enhance the physical and visual connectivity between the Winterbourne Stoke barrow group to the north of the existing A303 and the Diamond barrow group to its south. The extension of the land bridge, together with extensions to the overall tunnel length to almost 3.3km, reduces the total length of road in open cutting to 800m.*

2.15. These ‘additional mitigation measures’ (now incorporated in the DCO application for the scheme) would not satisfy the advice of the WH Committee under its Decision Item 7, in which the specific request was to

*“minimize the length of the culvert [i.e. cut-and-cover] part of the tunnel in order to reduce the impact on the cultural landscape and the archaeology”*<sup>51</sup>

2.16. Item 7 of the Decision was the subject of considerable discussion in Committee (the proceedings were watched live by us in the UK) and the wording *“minimizes the length of the culvert part of the tunnel”* was carefully chosen and re-confirmed to avoid misunderstanding. Unfortunately, Highways England has taken this advice to mean ‘minimize the length of open cutting’ and the DDCMS appears to have done the same. A culvert is generally understood to be a tunnel carrying a stream or open drain under a road or railway, i.e., a covered cutting.

2.17. Cut-and-cover tunnelling within the Stonehenge landscape would involve complete loss of archaeological deposits within the areas of the cuttings; while the WHS cultural landscape,

---

<sup>50</sup> *Ibid.*, Executive summary

<sup>51</sup> UNESCO World Heritage Committee Decision 42 COM 7B.32, 2018, Item 7.

<https://whc.unesco.org/en/decisions/7261>

which has intrinsic integrity apart from any specific present-day views, would undergo major damage and modification. The urgent request under the 2018 WH Committee’s Decision, Item 7, was therefore hardly surprising.

2.18. The 2018 Advisory Mission had already said, of the western tunnel portal and treatment of the expressway exiting from it,

*“The Mission considers that moving the western portal away from the previously proposed location (to the south-east) is an improvement and that the use of land bridges and grassed canopy would lessen the potential visual impact. However this portal location would require total removal of archaeological resources, cutting, portal and tunnel infrastructure, and construction of more than a kilometre of new dual carriageway within the WHS. As noted in previous Heritage Impact Assessment reports by Snashall & Young (2014 and 2017), (which evaluated a previous scheme), this location and alignment would give rise to negative heritage impacts on the Winterbourne Stoke and Diamond monument groups. Therefore, 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. 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.”<sup>52</sup>*

2.19. In respect of the extended cut-and-cover green bridge and tunnel entrance(s) proposals, the DDCMS, in its 2018 State of Conservation Report, says:

*“the cut and cover tunnel could result in a marginally wider land-take. Considering this wider land-take against the potential archaeological remains identified by the scheme’s extensive programme of archaeological assessment and evaluation, it appears that little additional archaeology relevant to the OUV of the WHS would be impacted. This covering of the cutting is likely to result in a neutral overall impact on archaeological remains that contribute to OUV, compared to the proposed scheme. Any marginal additional land-take would therefore be unlikely to make any material difference to the impact of the scheme on archaeological remains considered by the Committee in July 2018.”<sup>53</sup>*

**2.20. To suggest that any marginal additional land-take would be “unlikely to make any material difference to the impact of the scheme on archaeological remains considered by the Committee in July 2018” is disingenuous. The results of archaeological evaluation in 2018 underline the critical importance and extreme sensitivity of the archaeology west of the west tunnel portal location.**

---

<sup>52</sup> UNESCO WH Centre and ICOMOS, *op. cit.*, p.27.

<sup>53</sup> Department for Digital, Culture and Sport, State of Conservation Report for the Stonehenge, Avebury and Associated Sites World Heritage Site, 1 February 2019. <https://whc.unesco.org/en/documents/171631>

2.21. At the time of writing we still await the archaeological evaluation reports for the DCO application (April 2019) but it is known that evaluation trenches along the scheme corridor in the area of the western cutting have revealed concentrations of worked flint probably contemporary with the erection of the Stonehenge megaliths. Together with nearby inhumation burials of a similar date, they provide a strong possibility that there may be a crucially important Chalcolithic/EBA settlement in this area, respecting and/or re-using earlier sites nearby. Such sites would include the (unique to the UK) group of Neolithic long barrows through which the huge road cutting would be made, the Wilsford Shaft and other potentially similar features, one of which was discovered and partially excavated during the evaluation. This appears to be a highly significant area of the WHS about which there is much to learn in spatial terms as well as by excavation. Excavation ahead of the road scheme would lead to unquantifiable losses to potential knowledge of the WHS and its OUV attributes.

2.22. Furthermore, there are concerns about the need for ground stabilisers at the tunnel portals: these can be very substantial and visually unattractive structures for which no illustrations have been given. There is also the potential for subsidence and vibration caused by the tunnel boring machine which could damage archaeological deposits and features in situ. No measures have been proposed to prevent or deal with such events.

2.23. At both tunnel portals, the WHS landscape and settings of key archaeological monuments would be severely compromised but we have been given no illustrations of views looking along the Expressway, for example, from the ancient Avenue and from Wilsford barrow G1.

2.24. We find the suggestion in the DDCMS' SoCR that Longbarrow Roundabout could not be moved further west and closer to a bored tunnel emerging west of the WHS unconvincing without more detailed information. The current proposals for a massive interchange close to the WHS boundary and a deep cutting with overpass beside Longbarrow would be very damaging indeed to the setting and integrity of the WHS itself, quite apart from the settings of individual barrow groups and nearby scheduled monuments. It needs to be borne in mind that the WHS has no buffer zone and a planned setting study has not yet been undertaken.

2.25. With future modes and volumes of road transport and concerns about climate change, the present and predicted increased impacts of traffic may be considerably reduced within the next century (the approximate lifetime of the tunnel). The present roads and roundabouts would then appear less intrusive and, potentially, could be reduced in size or removed, leaving a far less severe imprint on the landscape than the proposed A303 scheme *and* the present road system would do. All these features would, of course, remain dominant both visually and physically in the archaeological record for ever.

2.26. The Analysis and Conclusion by the WH Centre and Advisory Bodies to the 2018 WH Committee includes the following paragraphs, the content of which was drawn from the 2018 Advisory Mission's report:

*“The 2018 Advisory mission concluded that the rigorous investigation, evaluation, iterative design and assessment process of the project has revealed that, if the tunnel*

*solution is to be pursued, the current length proposed is not adequate to protect the authenticity, integrity and Outstanding Universal Value (OUV) of the property. The best option (in terms of OUV) would be a surface route, which re-routes the A303 completely around the Stonehenge component of the property, and enables the closure of the existing section of the A303 within the property. If a surface route is not possible, a longer tunnel is needed, which removes or at least substantially reduces the proposed lengths of dual carriageway within the property, in order to avoid the impact on the integrity, authenticity and OUV of the property.” And*

*“The 2018 mission acknowledged that the eastern portal has been positioned in the least impactful location available close to the property’s boundary, given the constraints imposed by the attributes of the property, other significant sites in the vicinity and local topographic and environmental conditions. However, a tunnel portal much further to the east, completely outside the property, could better protect the OUV of the property from the impact of associated dual carriageways. The western portal location involves an intrusive section of cut dual carriageway within the property. Therefore, if a tunnel solution is pursued, the western portal should be re-located outside the western boundary to avoid dual carriageways within this part of the property.”*

*“The State Party and its agencies should continue to proceed thoroughly and cautiously, to ensure that the optimal solution is identified and implemented for the widening of the A303. If the ‘Proposed Scheme’ tunnel option is pursued, substantial design refinement should occur and respect for the OUV of the property should take precedence over any predetermined project deadlines. The decision making processes for the project have not yet afforded sufficient priority to avoiding adverse impacts on the OUV of the property, particularly relative to economic and environmental considerations.”<sup>54</sup>*

---

<sup>54</sup> UNESCO World Heritage Centre, “Analysis and Conclusion by the World Heritage Centre and Advisory Bodies in 2018”. <https://whc.unesco.org/en/soc/3744>