



National
Trust

Relevant Representation

A303 Amesbury to Berwick Down (Stonehenge)

January 2019

1. Introduction

- 1.1 The National Trust is Europe's largest conservation charity with over five million members. Established over 125 years ago, its primary purpose is to promote the preservation of special places for the benefit of the nation. To achieve this aim, the Trust owns and manages places of historic interest and natural beauty; it also has the unique ability to declare its land 'inalienable'.

2. Context

- 2.1 The Trust owns more than 800 ha of the Stonehenge part of the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS), and we take our role as custodians very seriously. Currently, the busy A303 road cuts through the WHS, having a major adverse impact on its Outstanding Universal Value (OUV), and acting as a barrier to people and wildlife seeking to access and explore the landscape. In addition, the Trust is aware of the longstanding challenges of highway access to the South West via the A303 route corridor.
- 2.2 The Trust therefore welcomed the announcement of the Government's intention to invest in a bored tunnel to remove a large part of the existing A303 from the Stonehenge landscape. We consider that – if well-designed and delivered with the utmost care for the surrounding archaeology and chalk grassland landscape – it could provide an overall benefit to the WHS. More specifically it could help to reunite the landscape, providing improvements to monument setting, tranquillity and access for both people and wildlife.

3. Areas of interest

- 3.1 In responding to the proposed scheme, the Trust's key areas of interest are cultural heritage, landscape, ecology and public access. This applies to both the potential benefits and any adverse impacts, and to the design, mitigation, construction and the operational phase. In addition, we have an interest in related matters such as appearance, noise and vibration, artificial light, air quality, water quality, public amenity and implications for visitor experience and land management. Finally, we have an interest in the overall planning balance and in the draft DCO, including its Requirements, compliance and monitoring.

4. Current position

- 4.1 The Trust welcomes the progress made by Highways England to date, and considers that the proposed scheme has the potential to be acceptable and deliver tangible benefits to the WHS. However, we will only support the progression of a scheme which we are sure protects the OUV of the WHS. Given the unique and internationally significant nature of the landscape, we do not consider that the DCO submission from Highways England currently provides the level of detail required for us to be confident that the approach to design and delivery of the scheme will achieve this essential goal. In addition, there are some areas of the current design approach that we disagree with, as well as important areas of methodology that are yet to be defined.

5. Initial issues and concerns

- 5.1 Having appraised the DCO documents, our initial areas of concern in relation to design and delivery of the scheme can be broadly summarised as follows:
- 5.1.1 **Insufficient detail** – at this stage the DCO documentation does not sufficiently show critical detail across a broad range of matters in relation to both design and delivery. The Trust would like to see this detail defined through the DCO, and where this is not appropriate seeks provision within the DCO to ensure the Trust is a consultee on all key aspects of the detailed design and delivery through Requirements and bespoke protective provisions.
- 5.1.2 **Document development** – the Trust has a strong interest in the development of the key control documents within the DCO including the DAMS (Detailed Archaeological Mitigation Strategy), OWSI (Outline Written Scheme of Investigation), CEMPs (Construction Environmental Management Plan) and HEMP (Handover Environmental Management Plan). The approach defined within these documents will be key in our assessment of the scheme's suitability. As such, we expect to be closely consulted in their development. At this stage we would have expected to see the DAMS, and the completed Archaeological Evaluation Reports that support it, but to date we have not.

- 5.1.3 **Rights of Way** – the overall Rights of Way strategy needs further consideration, especially in regards to the proposed treatment of the current A303 and the redundant portion of the A360 and other NMU (Non-Motorised User) access post scheme construction.
- 5.1.4 **Byways** – the status of the current BOATs (Byways Open to All Traffic) require further consideration to ensure compatibility with the overall configuration of the other forms of access and Rights of Way within the WHS post scheme construction.
- 5.1.5 **Limits of deviation** – the Trust’s initial review indicates that some of the proposed Limits of Deviation (LoDs) are a cause for concern given the wide variation possible within the LoDs. The Trust has particular concerns with regards to the impacts on the OUV of the WHS landscape around both of the portal entrances. We would welcome further clarity from, and discussion with, Highways England with regards to the proposed LoDs and their implications, including any knock on effects to other scheme elements.
- 5.1.6 **Restrictions on National Trust land** – we are not yet convinced that the restrictions proposed above the tunnel on Trust land (as well as on adjacent land) are appropriate for a WHS where restrictions on archaeological research could adversely impact its OUV. In addition we require further information on how the sub-surface archaeology within the area Highways England intend to purchase will be adequately protected post-construction.
- 5.1.7 **Ecology** – there is insufficient detail in the OEMP (Outline Environmental Management Plan) to allow us to adequately assess if the approach to mitigation, establishment methodology, and subsequent management is wholly suitable. In some cases we have identified areas where proposals should be strengthened, for example mitigation for European Protected Species at the Countess flyover, and the potential for improved east-west ecological connectivity. We also seek further clarity on the interrelationship of, and how information will transfer through, the OEMP to the CEMP, and to the LEMP (Landscape & Ecology Management Plan) and HEMP.
- 5.1.8 **Countess Farm** – there is potential for significant landscape, visual, noise and vibration impact at Countess Farm and we require further information to be satisfied that the proposed mitigation measures fully address these issues.
- 5.1.9 **Operational phase** – further clarity is needed around the types and frequency of activities which will need to be carried out once the proposed scheme is operational, how the impact of this activity will be assessed and how the Trust will interact with Highways England and their agents in this regard.
- 5.1.10 **Omissions, inconsistencies and errors** – there are a number of discrepancies, inconsistencies and areas in need of further clarification. We expect Highways England to address these where appropriate by means of addendums.

6. Land Take

- 6.1 The DCO includes the need for land that is owned by the Trust to be compulsorily acquired, and as such the Trust is considered an 'affected person'. In 1907 Parliament gave the Trust a power to declare land 'inalienable', and the Trust's land at the Stonehenge landscape is today held inalienably. At this stage, the Trust objects to the acquisition of this land on the grounds of the issues raised in this Relevant Representation, and to be raised further in the examination process. These issues represent significant reasons why land held by the Trust for the benefit of the nation should not be released for the purposes of the scheme until they are adequately resolved to the Trust's satisfaction, and solutions secured in the final form of any confirmed DCO documentation.
- 6.2 The Trust also notes that the DCO includes wide powers of temporary possession which the Trust does not consider should apply to its land. The potential use of temporary possession powers over Trust land needs to be controlled and monitored to avoid adverse impacts on the WHS, including during construction. The Trust therefore expects to see these controlled within the DCO, potentially through avoidance and appropriate protective provisions.

7. Conclusion

- 7.1 The National Trust is a significant landowner at the Stonehenge landscape, and is an advocate of a solution for the A303 that would remove a large part of the existing A303 from the WHS, reuniting the landscape, whilst protecting the integrity of this special place. We welcome the progress made by Highways England to date. At present, based on our initial appraisal of the DCO documents, we have a range of issues and concerns that we intend to raise through the DCO process.
- 7.2 We seek further provisions to be made within the DCO, and for Highways England (and its contractors) to work with and consult with the Trust (and other key stakeholders) in a meaningful way through the entire life of the project, and post construction.
- 7.3 In order to build the proposed scheme, Highways England would need to compulsorily acquire National Trust inalienable land. The Trust promises to look after its special places 'for ever, for everyone'. The Trust will not part with its land held inalienably unless we are completely satisfied that the proposals are, in all the circumstances, appropriate. We are objecting at this stage to the purchase of National Trust land held inalienably in order to ensure the best possible outcome for the WHS is secured. In due course, if we are convinced that the scheme addresses the issues and concerns we are raising, and offers the level of protection we have pressed for throughout, we will be in a position to remove our objection.