

**From:** Bush, Mark [<mailto:mbush@dacbeachcroft.com>]

**Sent:** 25 June 2020 16:38

**To:** Rob Pridham <[Rob.Pridham@dft.gov.uk](mailto:Rob.Pridham@dft.gov.uk)>

**Cc:** 'Victoria Hutton' [REDACTED]

**Subject:** RE: A303 Stonehenge Tunnel scheme - late representation

**Importance:** High

Dear Mr Pridham,

Further to my email below, please see attached the late representation made on behalf of the Consortium of Archaeologists and the Blick Mead Project Team, along with the accompanying statement of Dr Paul Garwood.

We would be grateful if you would bring these submissions concerning the recent discoveries in the Stonehenge WHS to the attention of the Secretary of State, as they will have an important bearing on his decision.

Yours sincerely,

**Mark Bush**

On behalf of the Consortium of Archaeologists and the Blick Mead Project Team

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**From:** Bush, Mark

**Sent:** 24 June 2020 12:46

**To:** 'Rob.Pridham@dft.gov.uk' <[Rob.Pridham@dft.gov.uk](mailto:Rob.Pridham@dft.gov.uk)>

**Cc:** 'Victoria Hutton' [REDACTED]

**Subject:** A303 Stonehenge Tunnel scheme - late representation

**Importance:** High

Dear Mr Pridham,

Your name has been passed to me by Stonehenge Alliance as the relevant contact at the DfT regarding the above scheme, upon which the Secretary of State's decision is expected imminently. I am contacting you as a matter of urgency on behalf of the Consortium of Archaeologists and the Blick Mead Project Team, further to our participation in the Public Examination process last year. We have been aware of the recent further consultation raised by the Secretary of State concerning the scheme, and responses from Highways England and several interested parties. We were content to stand behind the responses on the CBA and Stonehenge Alliance in that process.

However, you will be aware I am sure of the very recent announcement this week of the discovery of an unprecedented monumental array of massive pits encircling Durrington Walls henge, and other huge pits distributed widely across the Stonehenge WHS. The new findings have significant implications for the Secretary of State's decision, and, given the direct involvement of some members of the Consortium in this discovery, we feel it is important to submit short representations on the point either later today or tomorrow, as soon as they can be finalised, in order that the Secretary of State is fully informed.

Your sincerely,

**Mark Bush**

On behalf of the Consortium of Archaeologists and the Blick Mead Project Team



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**Re: Discovery of ‘A Massive, Late Neolithic Pit Structure associated with Durrington Walls Henge’**

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**SUBMISSIONS ON BEHALF  
OF THE CONSORTIUM OF ARCHAEOLOGISTS  
AND THE BLICK MEAD PROJECT TEAM**

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1. These brief submissions are written on behalf of the Consortium of Archaeologists and Blick Mead Project Team. They concern the recent discovery of ‘A Massive, Late Neolithic Pit Structure associated with Durrington Walls Henge’ within the Stonehenge World Heritage Site (‘the WHS’).<sup>1</sup> Appended to these submissions is a statement from Paul Garwood, Senior Lecturer in Archaeology, and one of the team that has published the recent discovery together with a PDF of the report into the recent discovery.
2. The recent discovery has significant implications for the decision over whether to grant development consent for the proposed tunnel through the WHS. In short:
  - a. the discovery undermines the heritage assessments conducted by Highways England (‘HE’) in that:
    - i. the discovery of the pits and demonstration that they are not natural features means that the conclusion that similar features found by HE in the vicinity, and along the line of the road corridor tunnel (some of which are proposed to be destroyed) are merely natural sinkholes is no longer safe;
    - ii. the fact that the heritage assessments did not pick up on the significance of these massive features, and similar features throughout the WHS and on the road line, as potential man-made Late Neolithic features, indicates that they are in no way near rigorous enough to assess the full heritage impact of the proposal; and
    - iii. the failure to identify the significance of the pits as part of the Environmental Statement (‘ES’) means that the Secretary of State cannot grant consent without

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<sup>1</sup> See PDF attached and <https://intarch.ac.uk/journal/issue55/4/>

breaching the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the 2017 Regulations).

- b. the discovery renders the Detailed Archaeological Mitigation Strategy ('DAMS') profoundly out of date; and
  - c. the discovery of a major Late Neolithic monumental structure which undoubtedly contributes to the Outstanding Universal Value of the WHS must be assessed as part of the decision over whether to grant development consent. The impact of the proposed scheme on the structure and its setting must be considered together with the impact of the proposed scheme on the WHS as a whole, which now includes a structure that has very considerable significance for understanding the entire landscape.
3. The submission and evidence provided by Paul Garwood on behalf of the Consortium have been prepared in a short time frame in order to ensure that the Secretary of State is apprised of the importance of the recent discovery prior to any decision being taken. The Consortium therefore reserves the right to (a) make further submissions/submit further evidence and/or (b) comment on submissions made by others (including Highways England) on this issue.

*The inadequacy of the heritage assessments*

4. In our previous submissions to the examination we drew attention to the fact that the proposal represents a breach of the World Heritage Convention ('WHC'). Articles 4 and 5 bear repeating:

***Article 4***

*Each State Party to this Convention recognizes that the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage referred to in Articles 1 and 2 and situated on its territory, belongs primarily to that State. It will do all it can to this end, to the utmost of its own resources and, where appropriate, with any international assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain.*

## **Article 5**

*To ensure that effective and active measures are taken for the protection, conservation and presentation of the cultural and natural heritage situated on its territory, each State Party to this Convention shall endeavor, in so far as possible, and as appropriate for each country:*

- (a) to adopt a general policy which aims to give the cultural and natural heritage a function in the life of the community and to integrate the protection of that heritage into comprehensive planning programmes;*
- (b) to set up within its territories, where such services do not exist, one or more services for the protection, conservation and presentation of the cultural and natural heritage with an appropriate staff and possessing the means to discharge their functions;*
- (c) to develop scientific and technical studies and research and to work out such operating methods as will make the State capable of counteracting the dangers that threaten its cultural or natural heritage;*
- (d) to take the appropriate legal, scientific, technical, administrative and financial measures necessary for the identification, protection, conservation, presentation and rehabilitation of this heritage; and*
- (e) to foster the establishment or development of national or regional centres for training in the protection, conservation and presentation of the cultural and natural heritage and to encourage scientific research in this field. (my emphasis)*

5. Paragraph 5.127 of the National Policy Statement for National Networks ('the NPS') states that the level of detail in a heritage assessment should be proportionate to the asset's significance. There can be no doubt that the WHS is an asset of the highest significance. The assessment of its significance and any impacts upon it should therefore rely on best available techniques and data. The submissions of the Consortium and particularly those of Prof. Mike Parker Pearson and Paul Garwood made this point at the examination. The Consortium made clear that both the heritage impact assessment and the DAMS proposed by HE are not fit for purpose. The recent discovery by the Hidden Landscapes Project demonstrates this. The fact that the potential significance of the pits, and similar features on and close to the road line, went unrecognized by HE, establishes that the assessment as a whole is sorely lacking. This is in breach of the NPS and also the WHC.
6. It is no answer to this point to state that the pits are removed from the site of the proposed scheme and therefore of no consequence. First, the WHS as a whole is an heritage asset, the impact of the proposal on the whole site must be assessed with the thoroughness which the WHC and NPS demands, this assessment must include all assets within the WHS, their settings and their interrelationships.
7. Second, the discovery of the pits undermines conclusions that HE has reached as to the presence of several possible pits that would be destroyed by the scheme (see Paul Garwood's statement at

para.2). Whilst there is a possibility that these features are natural, this conclusion is undoubtedly called into question in light of the compelling conclusions in the recent Hidden Landscapes study.

8. Regulation 4(2) of the 2017 Regulations prohibits the Secretary of State from making a DCO unless an EIA has been carried out in respect of the application. Regulation 5(1) defines an EIA as including the preparation of an Environmental Statement ('ES'). Regulation 5(2)(d) requires that an EIA 'must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on ... cultural heritage'. Regulation 14 governs ESs. Under reg.14(3)(b) an ES must 'include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment taking into account current knowledge and methods of assessment' and reg.14(3)(c) 'be prepared, taking into account the results of any relevant UK environmental assessment, which is reasonably available to the applicant with a view to avoiding duplication of assessment.'
9. The failure of the ES to address the heritage significance of the pits means that it is clearly defective and does not meet the requirements of the 2017 Regulations. As such, pursuant to Regulation 4(2) the Secretary of State cannot make the DCO at present.
10. The discovery of the pits also renders the DAMS out of date. As Paul Garwood sets out at paragraph 2 of his appended statement:

*'The possible (unrecognized) presence of massive anthropogenic features within the A303 DCO boundary clearly needs to be evaluated and any mitigation strategy revised accordingly (e.g. there must be provision for 100% excavation of these features given their clear archaeological significance).'*

11. Additional to the above issues, the new discovery of a massive, very extensive Late Neolithic monumental structure close to the A303 corridor clearly has great heritage significance in and of itself and also contributes to the heritage significance of the WHS. This must be assessed by the Secretary of State as required by paragraph 5.128 of the NPS and the 2017 Regulations. At present, the Secretary of State has no assessment before him to reach conclusions on this issue. Therefore, the Secretary of State cannot at present reach an evidence based conclusion on the impact of the proposal on the new feature together with the WHS as a whole.

*Next Steps*

12. As stated above, the Consortium (through Paul Garwood) sets out the fundamental issues which this new discovery presents for the new road and tunnel. Put simply, a grant of consent cannot be entertained on the evidence as persists at present, not least because such a grant would contravene the 2017 Regulations.
  
13. As stated by Paul Garwood, the discovery of the pits ‘must fundamentally reconfigure all current knowledge and understanding of the prehistoric landscape’. In light of this, and the profound impact that this discovery has for understanding the true heritage impact of the scheme, it would be inappropriate for the discovery to be dealt with in an *ad hoc* manner by written representations under rule 19 of the Infrastructure Planning (Examination Procedure) Rules 2010. Such an approach would likely be procedurally unfair to the parties involved. Given the importance of the issue, which undermines a key part of the Environmental Statement and the mitigation strategy, it is clearly in the public interest and that of the parties that the issue is subjected to examination by the examination authority adopting a procedure which ensures that all parties are consulted upon and able to make representations/submit evidence. In the event that the Secretary of State is minded to approve the scheme, then the Consortium respectfully requests that the Secretary of State re-opens the examination in order to ensure that the impacts of the discovery are fully understood.

**Victoria Hutton**



## **The implications of the Durrington pits monumental structure and other pit discoveries in the Stonehenge landscape for the A303 road scheme**

Paul Garwood

*Senior Lecturer in Archaeology  
University of Birmingham*

The discovery of an unprecedented monumental array of massive pits encircling Durrington Walls henge, and other huge pits distributed widely across the Stonehenge WHS (announced on 22<sup>nd</sup> June, and published in *Internet Archaeology* 55; Gaffney *et al.* 2020), has major implications for the A303 road scheme in general and the Detailed Archaeological Mitigation Strategy (DAMS) in particular.

1. The newly discovered monumental array of massive pits (each c.20 m in diameter and, where core-sampled, c.5-6 m deep) forms an incomplete sub-circular arrangement c.2.2 km in diameter with Durrington Walls at the centre (Figure 1). This must fundamentally reconfigure all current knowledge and understanding of the prehistoric landscape. Dating evidence indicates they are probably contemporary with the period of use of both Stonehenge and Durrington Walls, and thus part of the Late Neolithic ceremonial landscape. The southernmost pits are only 200 m from the northern edge of the A303 DCO corridor (Eastern Portal approach, to the north of Vespasian's Camp). Potential relationships between the pits and other features around the circumference of the pit circuit in this sector, including the area of the A303 corridor, clearly need to be taken full account of before final decisions on the proposed scheme are made. Furthermore, any future development of the A303 within the eastern part of the WHS will impact upon the landscape setting of this new extraordinary Neolithic monument complex, the extensive scale and unique character of which add significantly to the OUV of the WHS.

2. The identification of numerous other exceptionally large pits in the wider landscape (also by the *Stonehenge Hidden Landscapes Project* team; cf. Gaffney *et al.* 2020, fig.9) highlights the widespread presence of these little understood but highly significant features for understanding Stonehenge and its setting (Figure 2). Those mapped so far include one within the Western Portal approach, just to the east of Winterbourne Stoke Crossroads (sampled during the evaluation stage but not recognized as a possible man-made feature: Highways England 2019a; Trench 241, feature 24105). The surface fill of a similar 'natural' feature was recorded just to the northeast, within the line of the proposed road cutting (also in Trench 241). A similar larger feature has also been recorded in the Crossroads Junction area just to the west of the WHS boundary (sampled by coring during the evaluation stage: Highways England 2019b; Trench 448, feature 44807), and another in the Eastern portal approach area (Highways England 2019c; Trench 512, feature 51224). These features may prove to be natural but this cannot be presumed: two of those already investigated contained artefacts in their upper fills (F24105, F44807), while the massive Durrington pits and the famous Wilsford shaft site (just east of F24105) highlight the possibility that they are man-made. The possible (unrecognized) presence of massive anthropogenic features within the A303 DCO boundary clearly needs to be evaluated, and any mitigation strategy revised accordingly (e.g. there must be provision for 100% excavation of these features given their clear archaeological significance).

3. The cultural significance of natural hollows in the Stonehenge landscape, and the potential for significant archaeological evidence within sedimentary deposits in valley contexts within the WHS are highlighted again by the new discoveries. The frequent occurrence of cultural evidence in natural



features, and the close similarity of the massive pit features and many natural solution hollows (in terms of their overall size and original surface appearance as deep hollows) may well be no coincidence. It is possible that the Durrington pits were inspired by natural sinkholes that were already being used for cultural purposes, and that both site categories encompassed wider and hitherto uninvestigated patterns of prehistoric activity across the landscape. Archaeological evaluations commissioned by Highways England have noted but largely dismissed the archaeological potential of these features, recommending minimal future sampling in the DAMS (cf. Garwood 2019, sctn. 4.4): this suggests a profound misunderstanding of the extensive nature of human agency across the cultural landscape, and some crude perceptions of relative archaeological significance. Instead, both natural features and sediments (including buried soil horizons of the kind identified in the Eastern Portal approach; Highways England 2019c; Trench 504, layer 50405) require 100% excavation to ensure a comprehensive understanding of the cultural evidence.

4. The new discoveries around Durrington Walls henge (based on combined geophysical survey and borehole sampling), and the A303 comparative data outlined in point (2), raise serious concerns over the quality of the A303 archaeological evaluation process (in addition to the highly critical assessments already communicated to the Examination Authority: e.g. Council for British Archaeology 2019, part 5; Garwood 2019; Parker Pearson 2019). In particular, it is evident that there is very little correspondence between sub-surface features identified in A303 geophysical surveys and those revealed through evaluation trenches in the Western Portal approach (Highways England 2019a; Part 2 – Figures), the Longbarrow Junction area (Highways England 2019b; Part 2 – Figures), and the Eastern Portal approach (Highways England 2019c; Part 2 – Figures). Moreover, the interpretation of the geophysical data suggested very low numbers of features, yet the evaluation trenches revealed a multiplicity of features of various forms and sizes. It is especially striking that the large pit/solution feature 24105 in the highly sensitive Western Portal approach corridor appears to have been undetected by geophysical survey. There seems no reason, therefore, to have a high degree of confidence in the geophysical survey work undertaken so far as a basis for Archaeological Mitigation Strategy decision-making.

5. The very high-resolution multi-sensor geophysical mapping (combining several techniques) and the highly significant results produced by targeted coring and excavation achieved by recent field research projects, such as *Stonehenge Hidden Landscapes* (Gaffney *et al.* 2018, 2020) and the *Stonehenge Landscapes EMI Project*, suggest research-quality methodologies are needed for all archaeological purposes in and around the WHS (as befits its WHS status, and in order to sustain its OUV characteristics). The same point was raised on several occasions during the Examination hearings (e.g. with respect to plough zone sampling, the investigation of ‘natural’ features and sediments, and sampling levels in general). In this light, neither the A303 evaluation process nor the DAMS are fit for purpose in a World Heritage Site environment.

25/6/20

## References

- Council for British Archaeology 2019: *Summary of Oral Evidence Given on 21st August 2019*. ExA Deadline 8 submission, 9/9/19. (TR010025 – A303 Stonehenge report REP8-036)
- Gaffney, V., Neubauer, W., Garwood, P., Gaffney, C., Löcker, K., Bates, R., De Smedt, P., Baldwin, E., Chapman, H., Hinterleitner, A., Wallner, M., Nau, E., Filzwieser, R., Kainz, J., Trausmuth, T., Schneidhofer, P., Zotti, G., Lugmayer, A., Trinks, I. and Corkum, A. 2018: Durrington Walls and the Stonehenge Hidden Landscape Project 2010-2016, *Archaeological Prospection* 25 (3), 1-15. (<https://onlinelibrary.wiley.com/doi/10.1002/arp.1599>)
- Gaffney, V., Baldwin, E., Bates, M., Bates, C.R., Gaffney, C., Hamilton, D., Kinnaird, T., Neubauer, W., Yorston, R., Allaby, R., Chapman, H., Garwood, P., Löcker, K., Sparrow, T., Trinks, I. and Wallner, M., 2020: A massive, Late Neolithic pit structure associated with Durrington Walls Henge, *Internet Archaeology* 55. (<https://intarch.ac.uk/journal/issue55/4/index.html>)
- Garwood, P. 2019: *Comments on the Draft Detailed Archaeological Mitigation Strategy (dDAMS)*. [Highways England 2019: Applic Doc. Ref. 8.11 (Rev.2)]. ExA Deadline 7 submission, 12/8/19. (TR010025 – A303 Stonehenge report REP7-054)
- Highways England 2019a: *A303 Amesbury to Berwick Down. Archaeological evaluation report: Western Portal and approach*. (HE551506-AMW-HER-Z2\_ML\_M00\_Z-RP-LH-0001).  
Part 1: Text (TR010025 – A303 Stonehenge report REP1-045)  
Part 2: Figures (TR010025 – A303 Stonehenge report REP1-046)
- Highways England 2019b: *A303 Amesbury to Berwick Down. Ploughzone artefact sampling and trial trench evaluation: Longbarrow Junction*. (HE551506-AMW-EHR-Z2\_JN\_L00\_Z-RO-LH-0001).  
Part 1: Text (TR010025 – A303 Stonehenge report REP1-042)  
Part 2: Figures (TR010025 – A303 Stonehenge report REP1-043)
- Highways England 2019c: *A303 Amesbury to Berwick Down. Archaeological evaluation report: Eastern Portal*. (HE551506-AMW-HER-Z4-GN\_000\_Z-RP-LH-0001).  
Part 1: Text (TR010025 – A303 Stonehenge report REP1-047)  
Part 2: Figures (TR010025 – A303 Stonehenge report REP1-048)
- Parker Pearson, M., 2019: *Professor Parker-Pearson's Presentation Given at Issue Specific Hearing 8* [uploaded to the A303 Examination website by the Consortium of Archaeologists & Blick Mead Project Team, 9/9/19]. (TR010025 – A303 Stonehenge report REP7-052)

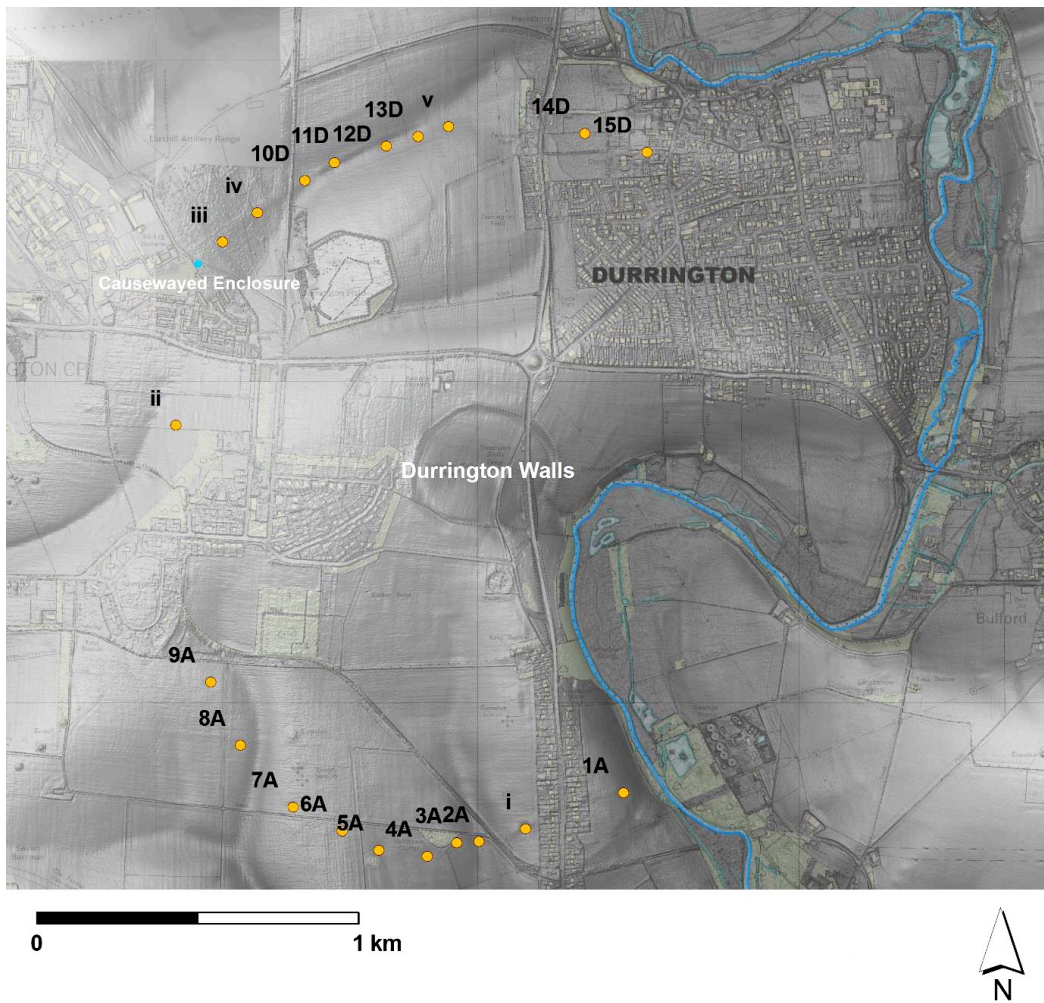


Figure 1: The monumental array of massive pits encircling Durrington Walls henge (the A303 corridor runs east-west just south of Pits 3A and 4A) (Gaffney *et al.* 2020, fig.8).

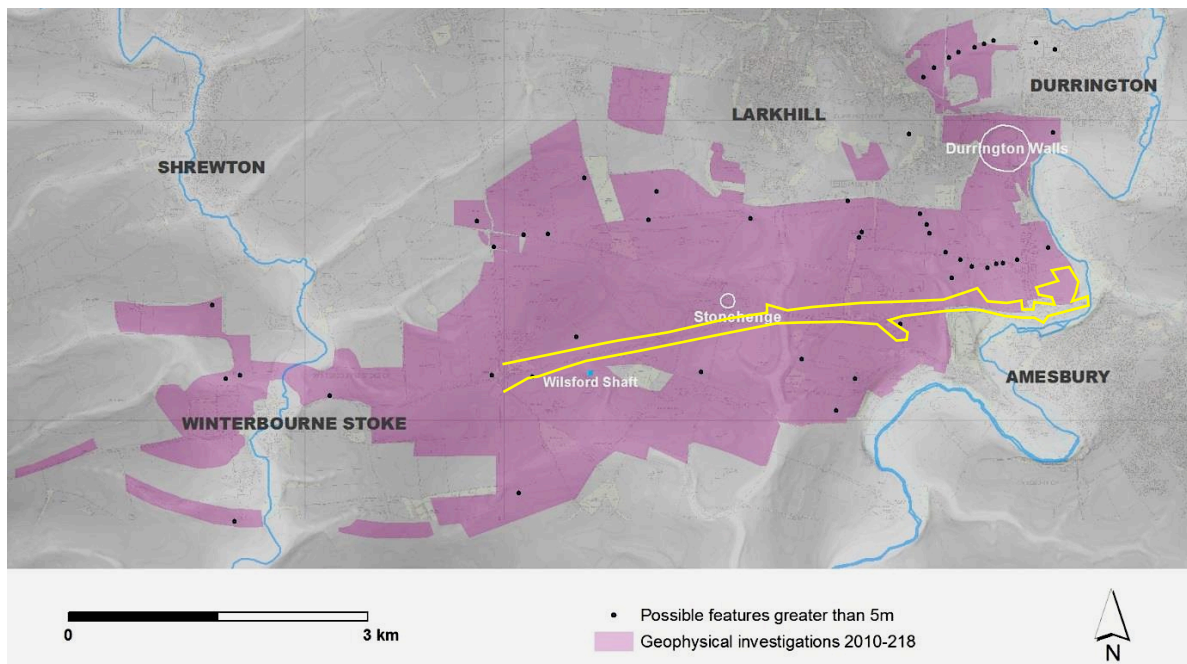


Figure 2: Locations of definite, probable and potential massive pits (over 5m diameter) mapped (to 2020) across the WHS and its environs, based mainly on geophysical survey data (Gaffney *et al.* 2020, fig.9; area of the A303 scheme DCO within the WHS area added in yellow).