Wiltshire Council

13th August 2020

Natasha Kopala
Head of Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

Highways and Environment
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Your ref: TR010025
Our ref: A303-AFP022 Response to SoS 13.08.2020

Dear Ms Kopala

RE: Application by Highways England for an Order granting Development Consent for the construction of a new two-lane dual carriageway for the A303 between Amesbury and Berwick Down in Wiltshire – Request for Comments and Further Information

Thank you for your letter dated 16th July requesting comments and further information on behalf of the Secretary of State for Transport with regard to the A303 Amesbury to Berwick Down road improvement scheme.

Wiltshire Council has reviewed the Hidden Landscapes Project report and representations from the Stonehenge Alliance and Consortium of Archaeologists and the Blick Mead Project Team in relation to this. The Council's views are set out in the attached document.

I trust that the information in the attached is helpful for the Secretary of State when considering the determination of the Application. However, if you require any further information, please do not hesitate to contact me.

Yours sincerely,

[redacted]

Parvis Khansari
Director
Highways and Environment

Direct line: 01225 713340
Email: parvis.khansari@wiltshire.gov.uk

Enclosed: Wiltshire Council Response to Secretary of State Request for Comments and Further Information, August 2020

Wiltshire Council

A303 Amesbury to Berwick Down (Stonehenge)

Secretary of State Request for Comments and Further Information

Wiltshire Council Response

August 2020

1. Introduction

On 16th July, the Secretary of State for Transport wrote to selected interested parties for the A303 Amesbury to Berwick Down (Stonehenge) road improvement scheme seeking comment and further information on matters raised in the Hidden Landscapes Project report and representations in relation to this from Stonehenge Alliance and the Consortium of Archaeologists and the Blick Mead Project Team.

Wiltshire Council wishes to comment on the Stonehenge Hidden Landscapes Project submissions and statements made within the Stonehenge Alliance representation. The Council's response to these are set-out in the following sections.

2. Response to Stonehenge Hidden Landscapes Project (SHLP) Theory

2.1. Introduction

The Council welcomes the opportunity to give our views on the two queries raised by the Secretary of State for Transport in his letter dated 16th July 2020. The queries upon which comment is sought relate to a series of documents presenting some results from the Stonehenge Hidden Landscape Project (SHLP).

The documents submitted set out a theory for the existence of a massive Late Neolithic pit structure associated with Durrington Walls. It is based on the discovery of a large number of pits-like features widely distributed throughout the Stonehenge landscape and beyond. A group of these features has been picked out and described as an unpresented array of pits forming a monumental structure, around 2 km in diameter, the largest prehistoric structure found in Britain. The evidence for this is based on an article published last month (Gaffney et al 2020[1]) that sets out the findings from large-scale geophysical surveys undertaken as part of the Stonehenge Hidden Landscape Project (SHLP) that began in 2010, led by Vincent Gaffney at the University of Bradford.

Many hundreds of pit-like features detected by the SHLP survey are still being analysed in preparation for publication. A large proportion of these are likely to be natural features. However, some features have been picked out to form "The Durrington Anomalies". This comprises 9 large pits located in a rough arc outside of Durrington Walls and are said to be linked as part some large-scale endeavour or monument building episode. 11 other features that seem to be on a similar alignment but discovered and excavated by Wessex Archaeology at Durrington and Larkhill, are incorporated into an incomplete circle of 20 features forming a Late Neolithic structure. The document also discusses the theory that similar large Late Neolithic features may have been missed in the A303 road scheme geophysical surveys and that some large pit-like features may have been missed or mis-interpreted during the A303 trial trench evaluation and by other nearby evaluation and excavation programmes at Larkhill and MOD Durrington.

There is no doubt that the existence of large numbers of pit-like features (whether natural or man-made) across this landscape is significant and presents an interesting challenge for archaeologists and the way the remnant prehistoric landscape is perceived. The majority are clearly natural in origin while some have cultural material within their fills due to agricultural practices and taphonomic processes that have eroded or washed debris into them. Those pits with cultural material are highly significant because they represent the vestiges of a past landscape use where most of the traces of activity have been damaged and / or eroded by agriculture and other subsequent activity.

[1] 'A Massive, Late Neolithic Pit Structure associated with Durrington Walls Henge'; Vincent Gaffney, Eamonn Baldwin, Martin Bates, C Richard Bates, Christopher Gaffney, Derek Hamilton, Tim Kinnaird, Wolfgang Neubauer, Ronald Yorston, Robin Allaby, Henry Chapman, Paul Garwood, Klaus Löcker, Alois Hinterleitner, Tom Sparrow, Immo Trinks, Mario Wallner and Matt Leivers; Internet Archaeology 55; June 2020
' The Implications of the Durrington pits monumental structure and other pits in the Stonehenge landscape for the A303 road scheme'; Part of submission document TRO10025 001960; Paul Garwood; June 2020

2.2. Difficulties with the Evidence Presented

The findings and interpretation offered (Gaffney et al 2020[1]) present several issues and difficulties that need to be set out before the Council can respond direct to the questions posed by the Secretary of State in his letter.

Understanding and interpreting the massive datasets recovered by high resolution geophysical surveys is a hugely challenging and difficult task. Hence it has taken over 10 years for some of the results of the SHLP project to be interpreted and presented. In order to make any sense of the data and to be able to pick out features formed by deliberate patterned human behaviour, a comprehensive programme of systemic excavation and sampling is required.

In the case presented, only 3 of the Durrington Anomalies were examined in August and October 2019 when cores were taken. However, there was no excavation. Without further examination by excavation it is difficult to compare these features to those excavated at Durrington and Larkhill by Wessex Archaeology and which are said to part of the same monumental structure.

Moreover, even with the 3 core samples, differential depositional histories were noted and only one produced a Late Neolithic date from a C14 sample. These 3 features are being presented as cut features of Late Neolithic date, but in the Council's view, the evidence for this is weak. The core samples have not demonstrated that the features are cut rather than natural, and nor have they consistently demonstrated a Late Neolithic date. Excavation is needed to shed further light on this. The article authors do recognise that there is a possibility the pits may be natural. The Council's Archaeology Service does not feel confident enough in the evidence presented for the presence of a Late Neolithic monument structure to enter this interpretation on the Historic Environmental Record.

It is difficult to then compare this core only evidence with the more comprehensive excavation evidence from the work of Wessex Archaeology at Larkhill, MOD Durrington and in the A303 evaluation programme. What is very clear is that most of the features or pits referred to and excavated by Wessex were natural in origin.

Over the last decade Wessex Archaeology has discovered a dozen large circular and irregular features of various sizes during projects in and around the Stonehenge WHS and beyond, some of which are referred to in the article (Gaffney et al 2020). Ten of them were detected using geophysical survey and nine of them subsequently investigated in detail by excavation and in some cases additional coring. All of them have proved to be natural solution features in the chalk bedrock. The quality of all these evaluations and excavations was monitored by the Wiltshire County Archaeologist as well as the quality of the reported results and interpretation. The County Archaeologist has concurred with Wessex Archaeology's conclusions that they were natural features. Whilst a small number of these hollows have attracted human activity around them, others seems to have simply been traps for cultural material. None of them appear to have been deliberately cut or altered.

The sections below examine some of the recent fieldwork that has taken place as part of the A303 Stonehenge road scheme and other commercial projects which highlight the problems with the presentation and interpretation of the evidence submitted by the SHLP.

2.2.1. Evaluation and Excavations at MOD Durrington

Two large features were investigated at the site of the fomer MOD Durrington 2010 and 2011 (Thompson and Powell, 2018[2]). Both had the appearance of solution holes or hollows and were investigated by excavation and sampled extensively. Weathering cones and natural erosion deposits were noted along with the gradual infill of these hollows over a prolonged period, which from the finds recovered from

[2] 'Along Prehistoric Lines, Neolithic, Iron Age and Romano-British Activity at the Former MOD Headquarters, Durrington, Wiltshire'; Steve Thompson and Andrew B. Powell; Wessex Archaeology Occasional paper; 2018

them appears to have been from the Middle Bronze Age to the Roman period. The investigation of both features was observed and advised on by Wessex Archaeology's geoarchaeology specialist (David Norcott) who firmly interpreted them as natural solution hollows. The hollow on the northern edge of the site had a naturally occurring flint layer around it and over 800 pieces of Late Neolithic struck flint retrieved in excavation. It is likely this natural hollow served as a focus for flint knapping and the deposition of waste flint material during the Late Neolithic. This is an interesting phenomenon but does not seem to be evident in any other excavated natural feature in the area. Other activity dating to the Late Neolithic and Early Bronze Age was recorded at this site including post alignments.

2.2.2. Evaluation and Excavation at Larkhill

During geophysical surveys, evaluations and excavations at Larkhill, as part of the Army Basing Programme, Wessex Archaeology has examined five similar large features again interpreted as sink hole or solution hollows (Wessex Archaeology October 2014[3], June 2015[4], March 2017[5], February 2020[6]). On excavation, they were all like those already described about at MOD Durrington. An additional sixth feature (referred to by Gaffney et al[1]) did not need to be excavated as it was outside of the development boundary and is still in situ. Two of the features were excavated in 2015 by machine dug slots, both were over 2 m deep. Middle Bronze Age pottery and flint was found from the upper layers, the lower layers were sterile. A third was found in geophysical survey and examined in April 2018 during works associated with a haul road. It was partially excavated as part was outside the development area, and a soil column taken. The fills of this feature are recorded as being formed through a combination of colluviation and plough-wash. Finds from all levels were a mixture of prehistoric flint and pottery with Roman pottery and building material. None of these deposits represent *in situ* activities but reflect the adjacent land use, most specifically the exploitation of the area for arable cultivation during the Romano-British period. The two other similar features at Larkhill were mapped and recorded in the evaluation in 2017 but were not able to be examined further on health and safety ground because they were cut by First World War military features that contained unexploded ordnance.

This morphology of all the features examined at Larkhill (low, broad weathering cone) is considered highly suggestive of natural sinkhole features, since artificial pits seldom remain open long enough for such profiles to develop. None of the Larkhill examples were observed to have any modification of the upper portions of the weathering cone, and no concentrations of artefacts were encountered. On-site geoarchaeological advice from Wessex's specialist was that the features were natural solution hollows.

Both at Larkhill and MOD Durrington these natural sink holes were associated with a range of pit like features that were clearly cut and andromorphic in nature. They varied in size but some of the larger ones held large posts and there is some limited dating evidence from the Late Neolithic. Some of these features which are very different in nature to those cored by SHLP have been interpreted in Gaffney's article as being part of the monumental Late Neolithic structure together with the features that Wessex archaeology have confidently interpreted as natural features.

[3] 'Larkhill East, Larkhill, Salisbury, Service Family Accommodation'; Detailed Gradiometer Report; Wessex Archaeology; October 2014

[4] 'Larkhill East and West Service Family Accommodation, Larkhill Wiltshire'; Archaeological Evaluation report; Wessex Archaeology; June 2015

[5] 'Larkhill Service Family Accommodation Haul road'; Detailed Gradiometer Survey report; Wessex Archaeology; March 2017

[6] 'Larkhill Service Family Accommodation: Post Excavation Assessment Report'; Wessex Archaeology; February 2020

2.2.3. A303 Road scheme Trial Trenching Evaluation

Four large natural solution features were discovered and examined during the A303 evaluations: one at Eastern Portal and Approaches, one in Western Portal and Approaches, and two in Longbarrow Junction (North) (Highways England April 2019 reports[7,8,9,10,11,12]). At Eastern Portal, the large natural hollow, detected initially with geophysical survey, was excavated to a depth of 1.35 m. The natural hollow was infilled with sediments accumulated by slope processes, as verified by Wessex Archaeology's geoarchaeological specialist. A group of Late Neolithic worked flint with a small Mesolithic component, plus some Early Neolithic and Beaker pottery was recovered and this material is considered to have washed into the natural feature.

A similar feature was hand excavated to a depth of 1.28m, then augured to 1.60m during the evaluation at the Western Portal. It had initially been picked up in geophysical survey. It was extensively sampled and mixed finds of worked flint, Beaker, Roman and Medieval pottery found, which is indicative of this feature being a natural trap for ploughed in material. Uniquely, this feature has patches of fire-reddened sediment in its upper fills, indicative of a burning event. The analysis of samples taken for this layer suggest a medieval or later date for this event.

At Longbarrow Junction, the evaluation confirmed the presence of two large natural depressions that had been picked up in the geophysical survey, both of which represented solution features infilled by sediment. The northern one was investigated by hand and the fill contained some limited cultural material. The southern one was investigated geoarchaeologically with a large machine dug section under the supervision of a geoarchaeologist. It contained an extensive sequence of deposits captured in a solution feature and was a unique sequence of Pleistocene loessic material for the local area. A sampling strategy was implemented to assess the potential and dating of this material. It was extensively sampled, and two borehole samples have been examined.

What is interesting about these two features is that they were very close in location but very different in nature, the northern one being a common solution hole with little evidence of human activity nearby that has been captured in its fill. The southern feature has a complex and unique stratigraphy borne out by the bore hole data and significant potential for further geoarchaeological analysis was identified.

All of the environmental samples from the A303 evaluation have been retained and stored by Wessex Archaeology.

2.2.4. A303 Road Scheme Geophysical Surveys

There have been four principal phases of large-scale geophysical survey conducted in connection with the A303 road scheme undertaken between 2016 and 2019; the first three phases informing the identification of a preferred route and the fourth completing a survey of the preferred route as part of the archaeological

[7] 'A303 Amesbury to Berwick Down, Trial Trenching evaluation Report 2'; Longbarrow junction part 1 text; Highways England; April 2019
[8] 'A303 Amesbury to Berwick Down, Trial Trenching evaluation Report 2'; Longbarrow junction part 2 figures; Highways England; April 2019
[9] 'A303 Amesbury to Berwick Down, Trial Trenching evaluation'; Eastern Portal part 1 text; Highways England; April 2019
[10] 'A303 Amesbury to Berwick Down, Trial Trenching evaluation Report 2'; Eastern Portal part 2 figures; Highways England; April 2019
[11] 'A303 Amesbury to Berwick Down, Trial Trenching evaluation'; Western Portal and Approaches part 1 text; Highways England; April 2019
[12] 'A303 Amesbury to Berwick Down, Trial Trenching evaluation Report 2'; Western Portal and Approaches part 2 figures; Highways England; April 2019

evaluation strategy for the scheme. The geophysics undertaken by Wessex Archaeology has used a similar approach to the SHLP and to a survey carried out by Historic England which has also informed the scheme.

All the surveys were undertaken to a common brief and standard, combining detailed magnetometer survey with targeted earth resistance and / or GPR survey. Gradiometers were mounted at 1 m intervals on a nonmagnetic cart, data were collected at 0.25 m intervals or closer, along transects spaced 1 m apart. GPR survey was targeted over areas where significant archaeological features were identified in the gradiometer survey, using an antenna mounted on a rough terrain cart with data collected along traverses spaced 0.5 m apart in the zigzag method. The detailed earth resistance data was collected at 0.5 m intervals along transects spaced 1 m apart, using a parallel twin probe configuration in the zigzag method.

In addition to the 4 principal phases of geophysical surveys, the following targeted surveys were also undertaken and reported to Examination at Deadline 1 along with phase 4 above:

- Electrical Resistance Tomography (ERT) and Borehole Survey – this examined the dry valleys east of Parsonage Down.
- Countess East GPR Pilot Survey – survey of two pilot areas, positioned to confirm and examine Anglo-Saxon sunken featured buildings and a Romano-British stone-built structure identified by previous geophysical surveys and trial trenching.
- Amesbury Road geophysical survey – gradiometer survey of c. 1.1 ha of land to determine the need for further evaluation.

This programme of geophysical survey undertaken for the A303 road scheme is the most thorough and comprehensive carried out for any archaeological project in Wiltshire. The detailed coverage and multiple techniques used are similar to approaches used in large scale research projects. Unlike the academic projects such as SHLP, it has the advantage of having tested the results with widespread trial trenching. Across the scheme 90% of features encountered during evaluation had been identified by geophysical survey. This is a very high level of concordance. Of the remaining 10%, the majorly of features were small pits and postholes or tree throws. All the large natural solution features encountered during evaluation trenching on the A303 had previously been identified in geophysical surveys.

2.3. Query 1: Implications of the archaeological find for the Development and any harm it may cause to the World Heritage Site

As set out above, there are difficulties with the interpretation of the pit-like features as a Late Neolithic monumental structure. If the Anomalies were considered as part of a monument of Late Neolithic date, it would clearly display attributes of Outstanding Universal Value (OUV). However, no features associated with this proposed structure will be directly impacted by the scheme. The closest of them is 200 metres to the north of the A303 road scheme's red-line area.

As outlined above, the Council is very confident that the evaluation programme of comprehensive geophysical surveys and trial trenching has been carried out to a high standard. It must be remembered that the Outline Mitigation Strategy (Highways England 2018) was discussed and approved by the A303 Scientific Committee. The Council is also confident in the interpretations of large natural features found by the A303 evaluation and during the fieldwork carried out at Larkhill and MOD Durrington. It is unlikely that any large pit-like features have been missed in the extensive geophysical survey or misinterpreted in the trial trenching evaluation.

In the unlikely event of any new features of this nature being discovered during the A303 mitigation phase of work (where the whole of the road line in the WHS will be excavated), such features would be thoroughly investigated in line with the Detailed Archaeological Mitigation Strategy (DAMS), providing a good research opportunity.

2.4. Query 2: Implications for the Applicant's Environmental Statement, including the Heritage Impact Assessment, and the proposed Detailed Archaeological Mitigation Strategy

In the Council's view, the findings do not change the assessment of impact of the A303 scheme on the OUV of the WHS contained within the EIA and HIA. However, the recent findings, at the very least, do raise interesting questions about how archaeologists interpret large natural features and highlights the significance of the cultural material sometimes found in them.

The DAMS sets out on overarching set of research questions and provides a mechanism for developing these via the Site Specific Written Schemes of Investigation (SSWSIs). This is an opportunity to closely define appropriate research questions to help throw light on these features (as may be found in the mitigation phase). The help of the A303 Scientific Committee will be sought during the development of the research questions within the SSWSIs via a series of workshops that have been planned prior to the start of the mitigation phases.

The A303 scheme offers a good opportunity to fully investigate and date any further features like this that may come to light during the mitigation phase. It is very clear that bore holes and geophysics on their own will not give the answers, but excavation will. Excavation by means of large machine dug sections and appropriate sampling, as has been carried out on other sites in the vicinity by Wessex Archaeology, will be the most likely method of providing the answers sought from these large enigmatic features. Dating is crucial to understanding what they are, how they formed and when. This type of large-scale excavation is the best way to maximise the chances in acquiring the suitable dating material needed to answer these questions.

The Council sees no need for a wholesale review of the key scheme documents which are comprehensive and compliant.

2.5. Conclusion

The existence of a plethora of pit-like features in the vast geophysical datasets in the Stonehenge landscape and beyond is significant, interesting and challenging. They are not new, having been known about since 2010, though following coring of three of them recently, a new theory that some of them make up a large Late Neolithic monumental structure has been proposed.

However, having examined the new evidence published in June this year (Gaffney *et al* 2020[1]), as well as the publications and reports from excavation and evaluation by Wessex Archaeology, the Council's view is there is not enough evidence to support the theory of a monumental structure. The evidence provided by Gaffney *et al* does not demonstrate that the pits assessed are anthropomorphic, or of a consistent Late Neolithic date.

Much more data is required in the form of excavation to throw further light on the significance of the large features with prehistoric material in them and any meaningful pattern to their wider landscape distribution, both inside and outside the WHS. They are certainly worth investigating and if the scheme is consented, the entire road line within the WHS will be excavated in line with the requirement of the DAMS, thus presenting a good opportunity to fully excavate such features should they be detected, and that would no doubt shed further light on this interesting theory.

As outlined above, the Council is very confident that the evaluation programme of comprehensive geophysical surveys and trial trenching has been carried out to a high standard and to a strategy approved by the A303 Scientific Committee. Wessex Archaeology has undertaken a careful and detailed investigation of the four natural features that were discovered in the A303 evaluation phase, using appropriate geoarchaeological specialists, as well as at Durrington and Larkhill. It is unlikely that any large pit-like features have been missed in the extensive geophysical survey or misinterpreted in the trial trenching evaluation.

In the Council's view, the findings do not change the assessments of impact of the A303 scheme on the OUV of the WHS contained within the EIA and HIA. The DAMS and forthcoming SSWSIs provide a mechanism for fully assessing any further such features which may be discovered during the mitigation phase on the road line and portals, in the unlikely event that they have not been picked up during the evaluation.

3. Response to Stonehenge Alliance Representation

The Council's response to selected extracts contained within Stonehenge Alliance's representation (TR010025-001961) is offered in the following sections.

3.1. Recent advice arising from consideration of the implications of Coronavirus

Section 2.1 of the Stonehenge Alliance representation states: "The May 2020 Institute of Civil Engineers' Green Paper and Report, *Covid-19 and the new normal for infrastructure systems*, [2] raises pertinent issues and questions concerning changes in infrastructure demands following Covid-19, coupled with the urgent need for net-zero carbon emissions by 2050. New methods of connectivity including digital working, a significant demand for multi-modal transport networks and public expectation that climate change will be fully addressed – along with scientific advice in decision-making and political will to address unprecedented challenges are all highlighted. "*A rapid review of major transport programmes to assess what needs to be rephrased*" is recommended but the outcome of any such review is unknown."

The ICE Green Paper referred to by the Stonehenge Alliance expressed a range of views on how the impacts of Covid-19 might affect infrastructure delivery, but the thrust of the report was to act as a basis for evidence gathering by the ICE, so that some informed views can be formed (taking into account the responses from the consultation's seven questions). There are some notable comments in the report, which are reproduced below:

'The ICG [UK Infrastructure Client Group] has already identified the importance of accelerating the core programmes and we will do this anyway. This paper is about the *strategic* opportunities and how to seize them.'

"With early indications from countries such as China suggesting a significant fall in public transport use and an increase in car use following the easing of lockdown restrictions, our assumption is that UK cities will need to move quickly to deliver increased space for safe walking and cycling to disincentivise the use of cars."

"The long-term demand drivers for infrastructure outlined earlier remain extant and will continue to drive decisions on major infrastructure programmes that take longer to plan, design and deliver. Despite this, it would be prudent to conduct a rapid review of the phasing of major programmes, particularly within transport, to ascertain what should be reprioritised in the medium term."

The Council does not regard this call by the ICE for evidence to represent, in any way, a reason to undermine the importance of improving the UK strategic road network in those areas such as Stonehenge, where there will continue to be a strong requirement for all of the strategic outcomes set out by Highways England (HE) in their Development Consent Order (DCO) application promoting the scheme.

It is also pertinent that the most significant transport impacts of Covid-19 and lockdown, relate to the travel behaviours in town and city contexts; there will be, post Covid-19, a stronger need to ensure that economic growth is not hampered by shortcomings in strategic infrastructure, or its improvement.

3.2. Office of Rail and Road (ORR)

In section 2.2 of the Stonehenge Alliance representation it states: "The **Office of Rail and Road** has also called on Highways England and the Department for Transport jointly with the ORR to take stock of the roads investment

strategy for the remainder of the road period and beyond. [3] This involves RIS2 projects, including the A303 Stonehenge Scheme."

The ORR chief executive, John Larkinson, in his letter referred to above to HE suggested that "at an appropriate point Highways England, DfT and ORR will need to jointly take stock of the package for both the remainder of the road period and beyond." The Council does not interpret this to mean that any scheme currently at DCO stage should be considered for abandonment or deferral, merely that the uncertainties, in relation to future forecast travel demand, might have been affected by the Covid-19 impacts. Only time will tell, as recognised by Larkinson, who goes on to say: "While I have not made any assumptions on the long-term impacts of the pandemic on factors such as travel demand or government policy, as these will only become apparent over time, there are a number of known factors that could affect the performance specification – which is the key basis from which we monitor."

The Council is of the view that there is no reason to defer the Stonehenge scheme, because future monitoring of actual outturn flows versus forecast flows will inform Department for Transport (DfT) policy in relation to longer term travel patterns.

3.3. Committee on Climate Change Report to Parliament

Section 2.3 of the Stonehenge Alliance representation states: "The **Executive Summary of the Committee on Climate Change's** *Reducing UK emissions: 2020 Progress Report to Parliament* (25.6.20) [4] says that, in terms of net zero carbon emissions, "*we are not making adequate progress in preparing for climate change*"; and, on p.142, it states that "*Overall, the Committee recommends that investments in low-carbon and climate adaption infrastructure must be at the heat of measures to restore economic growth following COVID-19.*" The report places emphasis on home working, stating that "*higher investment in resilient digital technology including 5G and fibre broadband should therefore be prioritised over strengthening the roads network*" (p.152 and, similarly, on pp. 145 and 179)."

The Council recognises the need to seek to respond to matters which adversely affect climate change. However, the A303 at Stonehenge is not a road which serves principally commuting work trip traffic during its periods of peak flows; work trip traffic may be most advantaged through the provision of improved and resilient digital technology, which in turn might be used to help encourage a reduction in the need to travel to, e.g., offices for work purposes, and an increase in home working. For these reasons, the Council does not consider that the travel uncertainties associated with Covid-19, and its work travel implications should be a consideration by the Secretary of State in relation to the determination of the DCO.

The future use of the A303, following Covid-19, is uncertain; at this time it is not possible to determine that forecasts flows might decrease in the longer term. Indeed, if restrictions recur in relation to overseas travel, or the perception of its attraction in terms of personal health and safety, the A303 may well be more heavily in demand by users seeking to gain access to the major vacation and leisure attractions of the south west peninsula. Indeed, in the recent DfT publication, https://www.gov.uk/government/statistics/transport-use-during-the-coronavirus-covid-19-pandemic, it is clear that there has been a consistent rise in all categories of road traffic since the lockdown trough; this is despite the significant level of home-working, which might partly explain the lower level of car use compared with pre-Covid-19 travel. The Council considers that any implication that longer term traffic volumes will have been significantly affected by the pandemic should be given little weight at this time.

3.4. Transport Action Network's Legal Challenge to RIS2

In section 3 of the Stonehenge Alliance representation it states: "We are aware that the legal challenge now under way may take some time before being heard in Court and, possibly, challenged on Appeal. In view of the unknown

outcome of this action, it therefore appears to us that it might be helpful to allow more time before any decision is made to proceed with the A303 Stonehenge Scheme."

The Council understands that an order by Mrs Justice Lieven declared the case against the DfT regarding the environmental legality of the £27.4bn road investment strategy (RIS2) brought before the courts by Transport Action Network to be significant, meaning it will be fast tracked for a full hearing by November this year.
The investment plan (RIS2), approved in March, includes £14.7bn worth of road route upgrades between 2020 and 2025. The Stonehenge Tunnel scheme is among the major projects which will get underway by 2025.

However, as noted by the Stonehenge Alliance, there is no apparent firm programme for achieving an outcome to the case, and outcome of the case itself will determine whether non-committed RIS2 infrastructure schemes will be able, or not, to go ahead within the proposed RIS2 timeframe.

The Council is of the opinion that the case, per se, is not relevant to the principle of the scheme for which the DCO application has been made and should not therefore be given weight by the Secretary of State in his further deliberations.

4. Conclusion

Wiltshire Council has reviewed the information contained within the Hidden Landscapes Project report and representations from the Stonehenge Alliance and the Consortium of Archaeologist and the Blick Mead Project Team. The Council's response is as set out above.

In summary, the Council considers that there is insufficient evidence to support the theory of a monumental structure. More investigation is required, in the form of excavation, to better identify the significance of the large features with prehistoric material in them and any meaningful pattern to their wider landscape distribution, both inside and outside of the WHS. The Council is very confident that the evaluation programme of comprehensive geophysical surveys and trial trenching has been carried out to a high standard and to a strategy approved by the A303 Scientific Committee. It is considered unlikely that any large pit-like features have been missed in the extensive geophysical survey or misinterpreted in the trial trenching evaluation. In the Council's view, the findings do not change the assessment of impact of the A303 scheme on the OUV of the WHS contained within the EIA and HIA. Furthermore, the DAMS and forthcoming SSWSIs provide a mechanism for fully assessing any further such features which may be discovered during the mitigation phase on the road line and portals, in the unlikely event that they have not been picked up during the evaluation.

The Council has also considered the need for more evidence to assess the possible implications of Covid-19 on travel patterns and demand as highlighted within the ICE Green Paper, the opportunity to consider the performance specification to ensure robust monitoring is used to inform future policy on long-term travel patterns, and the requirement to respond to matters which adversely affect climate change. However, the Council does not consider the points raised to be a material factor that should be taken into account by the Secretary of State in relation to the determination of the A303 Stonehenge DCO.

Wiltshire Council remains supportive of the A303 Stonehenge scheme and wishes to see the scheme implemented to deliver the identified benefits to the residents of Wiltshire.