

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

Your ref: TRO 10025

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 the opportunity to provide comment on the Hidden Landscape Project report and associated representations from the Stonehenge Alliance and the Consortium of Archaeologists and the Blick Mead Project Team. This is as per your letter dated 16th July on behalf of the Secretary of State for Transport regarding the A303 Amesbury to Berwick Down road improvement scheme.

The Stonehenge and Avebury World Heritage Site Coordination Unit (WHSCU) is currently managed through Wiltshire Council Heritage services. WHSCU's role is to draft, update and coordinate the implementation of the Stonehenge and Avebury World Heritage Site Management Plan working with national partner organisations, the local authority, landowners, farmers, local communities and other stakeholders. In addition, it monitors and reports on the condition of the WHS and revises and updates the Management Plan. The WHS Management Plan is endorsed by DCMS and partner organisations who sit on the local WHS Committees and the WHS Partnership Panel.

This response is on behalf of the WHSCU and does not purport to be on behalf of the partner organisations or other key stakeholders. It has however been discussed with the Chair of the WHS Partnership Panel.

In considering this issue, the WHSCU has had sight of Wiltshire Council's response, as depicted within Section 2 of 'Wiltshire Council's Response to the Secretary of State Request for Comments and Further Information', dated August 2020. WHSCU has also had sight of the submission on behalf of the Historic Buildings and Monuments Commission for England (Historic England). We are broadly in agreement with these analyses.

Following review of the material, the WHSCU considers that there is insufficient evidence to support the theory of a monumental structure. Further investigation, including excavation, is required to establish the significance of the features and whether their landscape distribution signifies a meaning pattern, both inside and

outside of the WHS.

Pits of this nature have been identified in the landscape before but the interpretation of some of them as part of a linked array of features, centred on Durrington Walls, is new. Some pits have been excavated. Core samples from, and the non-intrusive methods used on, some of the pits do not yet prove that the pits are man-made. The intrusive archaeological techniques used on others suggests that some, at least, are natural in origin. The dating evidence so far retrieved includes some material contemporary with some of the very long period in which Stonehenge and Durrington Walls were in use, although not in all the pits. There is also material from before and after that period. No convincing evidence has so far been presented to show that these pits, whether natural or man-made, had a monumental or ceremonial function. The roughly circular spacing of the pits near to Durrington Walls is intriguing however and an absence of evidence from investigations so far does not, of course, mean that such evidence will not eventually be found.

Implications of the archaeological find for the development and any harm it may cause to the World Heritage Site

The principle interest of the WHSCU is the protection of the outstanding universal value encapsulated in the designation of the Stonehenge environs as a World Heritage Site. Any discovery or interpretation of evidence of prehistoric human activity within or related to the site merits thorough investigation. The nature of the pits referred to, and the interpretation of evidence gathered, should be the subject of detailed research as with any other element of the prehistoric landscape which forms the Site's outstanding universal value. The nearest of the pits in question sits 200m to the North of the boundary of the A303 development and is therefore unlikely to be affected by the proposed scheme.

Implications for the applicant's Environmental Statement, including the Heritage Impact Assessment, and the proposed Detailed Archaeological Mitigation Strategy

Specialists involved in the investigation and interpretation of these pits have indicated that non-intrusive geophysical examination is insufficient to guarantee the identification of all sub-surface features. Nor is it adequate for dating or identifying the nature and purpose of these features. The remote investigations already carried out on broad areas of the site will not therefore have identified every feature which will be uncovered if the A303 development proceeds, but it is unlikely that these investigations would have failed to identify multiple very large man-made structures aligned in unnatural formations. No such features have so far been identified along the remainder of the redline area. Appropriate expert scientific advice should be sought to ensure that the DAMS would allow for such structures to be identified and excavated as they are discovered. New interpretations of natural and man-made features across the whole World Heritage Site, including those from the Hidden Landscapes Project, should be considered as part of those investigations.

Please do not hesitate to contact me should you have any questions or require further information in relation to this matter.

*Terry Bracher, Heritage Services Manager (Wiltshire Council)
On behalf of Stonehenge & Avebury World Heritage Site Coordination Unit.*