

A303 Amesbury to Berwick Down

TR010025

Additional submission

Highways England overarching response addressing 'new discovery' responding to Secretary of State letter dated 16 July 2020

APFP Regulation 5(2)(q)

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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Table of contents

Chapter	Pages
Executive Summary	5
1 Introduction	7
1.1 Secretary of State's request for information	7
1.2 Representation from the Consortium of Archaeologists and the Blick Mead Project Team	8
1.3 Representation from the Stonehenge Alliance	9
1.4 Structure of this document	9
2 Adequacy of the Archaeological Evaluation Strategy	11
2.1 Introduction	11
2.2 Development of the archaeological evaluation strategy	11
2.3 The evaluation strategy	12
2.4 Quality of geophysical survey and interpretation: correlation with subsurface features	15
2.5 Interpretation of large pit-like features in the evaluation	16
2.6 Reliability of the geophysical surveys	18
2.7 Conclusions	19
3 Robustness of the Heritage Impact Assessment (HIA)	20
3.1 Introduction	20
3.2 Conformance to guidance	20
3.3 HIA addendum – scope	21
3.4 HIA Addendum – outcomes	22
3.5 Conclusions	23
4 Environmental Statement: Cultural Heritage Assessment	24
4.1 Introduction	24
4.2 Conformance to guidance	24
4.3 ES Addendum – scope	25
4.4 Scheme effects	25
4.5 Conclusions	26
5 Detailed Archaeological Mitigation Strategy (DAMS): fitness for purpose	27
5.1 Introduction	27
5.2 Purpose of the DAMS and the Archaeological Research Agenda	27
5.3 Provision for development of the DAMS and site-specific approaches	28
5.4 Impacts on pit-like anomalies	29
5.5 Conclusions	30
6 Conclusions	32
6.1 Robustness of assessments	32
6.2 Adequacy of the evaluation strategy and the DAMS	32
6.3 NPS and WHC compliance	33
6.4 Secretary of State's request for information	34

Abbreviations List	35
Glossary	36
References	36
Appendix A	38
A.1 Responses to points raised in representations from the Consortium of Archaeologists and the Blick Mead Project Team	38

Executive Summary

The Secretary of State (SoS) has requested further information from Highways England and other stakeholders following a recent archaeological publication of a discovery by the Stonehenge Hidden Landscapes Project (the ‘Durrington Walls discovery’). The SoS has received representations from the Consortium of Archaeologists and the Blick Mead Project Team dated 25 June 2020 and the Stonehenge Alliance dated 26 June 2020, which cite the discovery.

The SoS has requested that Highways England, Historic England, Wiltshire Council and other recipients respond on:

- “implications of the archaeological find for the Development and any harm it may cause to the World Heritage; and
- implications for the Applicant’s Environmental Statement, including the Heritage Impact Assessment, and the proposed Detailed Archaeological Mitigation Strategy.”

This document sets out Highways England’s (the Applicant) response to the Secretary of State’s request for information in relation to these representations.

To aid the Secretary of State, the Applicant has taken the preliminary conclusions of the publication on the discovery at face value, and considered them in Addenda to the both the ES and the HIA for the Scheme. The Addenda conclude that even if the conclusions of the publication are correct, there is no change to the conclusions of the ES or the HIA on likely significant effects and impacts on the WHS as a whole respectively.

The Scheme will not adversely affect the physical remains of the suggested monumental structure, or its setting. The suggested discrete large pit-like anomalies across the landscape outside of the Scheme boundary will similarly be unaffected by the Scheme; those suggested within the Scheme boundary will either be protected and retained in situ, or archaeologically excavated and recorded.

The evaluation strategy was developed in consultation with HMAG and the Scientific Committee, and it and detailed SSWSIs flowing from it were approved by Wiltshire Council and HMAG. The archaeological evaluation results, combining geophysical surveys with testing by trial excavation, form a robust baseline on which to make assessments of the impacts of the Scheme upon archaeological remains.

The DAMS provides a comprehensive strategy for the mitigation of impacts on archaeological remains, and provides ample scope to address discoveries during the mitigation programme, and to take account of emerging discoveries and theories within the WHS. The DAMS is therefore fit for purpose.

The Applicant does not consider that the Durrington Walls discovery raises any issues with regard to compliance with the World Heritage Convention (WHC). The Scheme does not breach the WHC and is in full compliance with the UK’s international legal obligations. In light of the conclusions presented in the HIA

Addendum and ES Addendum, it is clear that the Scheme conforms with the NPSNN.

1 Introduction

1.1 Secretary of State's request for information

- 1.1.1 The Secretary of State (SoS) has requested further information from Highways England and other stakeholders following a recent archaeological publication in June 2020 of a discovery by the Stonehenge Hidden Landscapes Project (see Gaffney, V. et al. 2020 A Massive, Late Neolithic Pit Structure associated with Durrington Walls Henge, *Internet Archaeology* 55. <https://doi.org/10.11141/ia.55.4>) [1] ('the 2020 SHLP paper'), which lies partly within the Stonehenge, Avebury and Associated Sites World Heritage Site ('the WHS').
- 1.1.2 The 2020 SHLP paper describes a series of geophysical anomalies discovered south of the Durrington Walls Henge identified during fluxgate gradiometer survey undertaken by the Stonehenge Hidden Landscapes Project (SHLP) in 2012–13. The results are described as "preliminary" (Gaffney et al. 2020, 6. Conclusions). The paper describes these features for the first time and considers them in the context of known pit-like anomalies and excavated sinkholes/ dolines/ solution features noted to the north, at Larkhill and Durrington.
- 1.1.3 A number of additional isolated or discrete anomalies over 5m in diameter are illustrated in the 2020 SHLP paper (figure 9) across the wider landscape. These may be purely natural sinkholes with no cultural material associated, form natural repositories for cultural material, or be deliberately modified, dug or exploited for some cultural purpose.
- 1.1.4 The SoS has received representations from the Consortium of Archaeologists ('the Consortium') and the Blick Mead Project Team dated 25 June 2020 [TRO100205-001960], and from the Stonehenge Alliance dated 26 June 2020 [TRO10025-001961], which both cite the discovery.
- 1.1.5 The representations are based on the proposition that the Durrington Walls discovery has so changed understandings of the range of human activities and archaeological evidence of these, as to invalidate the assessments and related mitigation strategies submitted with Highways England's Application ('the Application') for a Development Consent Order (DCO) for the A303 Amesbury to Berwick Down scheme ('the Scheme').
- 1.1.6 The SoS has requested that Highways England, Historic England, Wiltshire Council and other recipients respond on:
- "implications of the archaeological find for the Development and any harm it may cause to the World Heritage; and
 - implications for the Applicant's Environmental Statement, including the Heritage Impact Assessment, and the proposed Detailed Archaeological Mitigation Strategy."

1.1.7 This document sets out Highways England's response to the Secretary of State's request for information in relation to the above representations.

1.2 Representation from the Consortium of Archaeologists and the Blick Mead Project Team

1.2.1 The representation from the Consortium of Archaeologists and the Blick Mead Project Team alleges that, without consideration of the new discovery the SoS cannot determine the Application on a number of grounds, which may be summarised as follows:

a. That the archaeological evaluation strategy adopted for the Scheme and which informed the assessments that accompanied the Application is inadequate in that it did not identify and interpret large pit-like features as potentially "man-made".

1.2.2 The Applicant does not accept that the archaeological evaluation undertaken for the Scheme is inadequate. The evaluation strategy was developed in consultation with the Heritage Management Advisory Group (comprising Wiltshire Council, Historic England, National Trust and English Heritage) ("HMAG") and the Scientific Committee and approved by Wiltshire Council and HMAG. The evaluation successfully identified and investigated the large pit-like features within the Scheme boundary that are cited by Mr Garwood. The Applicant considers that the interpretation of these features as of natural origin (but containing cultural material) is sound, based on the evidence from the evaluations.

b. That the Durrington Walls discovery changes the understanding of the WHS and its Outstanding Universal Value (OUV) so as to make the Heritage Impact Assessment (HIA) submitted with the Application (Environmental Statement (ES) Appendix 6.1 [APP-195]) unsafe; and

c. That, consequently, the conclusion of the ES (Chapter 6 [APP-044]) regarding the effect of the Scheme on the WHS as a whole and its OUV, Integrity and Authenticity, is unsafe.

1.2.3 The Applicant does not accept that the HIA and ES are unsafe following the Durrington Walls discovery. To aid the Secretary of State, the Applicant has nevertheless taken the preliminary conclusions of the publication on the discovery at face value and considered them in Addenda to both the ES and the HIA for the Scheme that specifically consider the discovery and its significance, its contribution to the Attributes, Integrity and Authenticity of the WHS, and the impact of the Scheme on the Durrington Walls discovery and on the OUV of the WHS as a whole.

1.2.4 These assessments are referenced in this document where relevant. As set out in more detail below, those Addenda conclude that even if the conclusions of the publication are correct, there is no change to the conclusions of the ES or the HIA on likely significant effects and impacts on the WHS as a whole respectively.

- d. That the Detailed Archaeological Mitigation Strategy (DAMS) [TR10025-001951, Available at: https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010025/TR010025-001951-A303%20Stonehenge%20-%20DAMS_18-05-2020.pdf] does not adequately provide for the identification, investigation and interpretation of large pit-like features in its archaeological research agenda and methodology, and is therefore not fit for purpose.
- 1.2.5 This submission fails to recognise the flexibility built into the DAMS. The DAMS provides ample scope to address discoveries during the mitigation programme, and to take account of emerging discoveries and theories within the WHS.
- e. That the failure of the heritage assessments to recognize the heritage significance of the Durrington Walls discovery and similar pit-like features on and close to the road line is in breach of the requirements of the National Policy Statement for National Networks ('the NPS'); and
 - f. That the Application conflicts with the UK Government's obligations under the World Heritage Convention ('the WHC').
- 1.2.6 The Scheme maintains conformity with the NPS. The HIA Addendum concludes that the discovery does not change the assessment of Scheme impacts on the WHS as a whole set out in the HIA submitted with the Application ('the Main HIA'), and the ES Addendum has not identified any new likely significant effects beyond those already identified in the ES submitted with the Application ('the Main ES').
- 1.2.7 The Applicant does not consider that the findings of the 2020 SHLP paper (considered in detail in the ES and HIA Addenda), or the submissions of the Blick Mead Project Team, Consortium of Archaeologists or the Stonehenge Alliance on 25 and 26 June 2020 raise any issues that bring into doubt or would cause a change to the Applicant's previous submissions regarding compliance with the WHC. The Scheme does not breach the WHC and is in full compliance with the UK's international legal obligations.

1.3 Representation from the Stonehenge Alliance

- 1.3.1 Item 1 of the representation from the Stonehenge Alliance [TRO-10025-001961], headed "A major new discovery within the WHS", makes similar points to the Consortium's submission regarding the completeness of the HIA, the adequacy of the archaeological evaluation and the adequacy of the DAMS.
- 1.3.2 The Applicant's views in respect of these points are as set out in section 1.2 above and the rest of this document.

1.4 Structure of this document

- 1.4.1 This document sets out the Applicant's response to the representations from the Consortium and the Stonehenge Alliance as follows.

- Section 2 – adequacy of the archaeological evaluation strategy
 - Section 3 – adequacy of the HIA
 - Section 4 – adequacy of the ES
 - Section 5 - adequacy of the DAMS
 - Section 6 – conclusions and compliance with the NPS and WHC
- 1.4.2 The above response sections refer to the Consortium’s submission in detail; the Applicant intends that the responses also cover the points raised by the Stonehenge Alliance and should be read accordingly.
- 1.4.3 **Appendix A** of this document sets out responses to each of the points raised by Ms Hutton in the Consortium’s representation; the points raised in Mr Garwood’s statement appended thereto are dealt with where relevant in sections 2 to 6 of this document.
- 1.4.4 This response considers the following aspects raised in the Consortium’s representation and Mr Garwood’s appended statement:
- The suggested “monumental structure” (‘the Durrington Walls discovery’) described in the 2020 SHLP paper;
 - The isolated and discrete possible large (>5m diameter) pit-like anomalies suggested from geophysical survey and shown in figure 9 of the 2020 SHLP paper and figure 2 of Mr Garwood’s statement¹; and
 - Pit-like features investigated in the evaluations undertaken for the Scheme and cited in Mr Garwood’s statement (paragraph 2).

¹ These large pit-like anomalies have been numbered on Figures 1 to 4 of the ES Addendum (Anomaly 001, etc). For convenience, these numbers are referred to throughout this document.

2 Adequacy of the Archaeological Evaluation Strategy

2.1 Introduction

- 2.1.1 The representation from the Consortium [TR010025-001960] includes a statement from Paul Garwood, one of the team that has published the 2020 SHLP paper. Mr Garwood contends (paragraph 4) that, “the new discoveries around Durrington Walls henge [...] raise serious concerns over the quality of the A303 archaeological evaluation process”. Mr Garwood links his comments to submissions made at the hearing on 21 August 2019 during the Examination of the Application on behalf of the Consortium (Garwood and Parker Pearson) and to those made on behalf of the Council for British Archaeology. These submissions were responded to in oral evidence given at the hearing [see written summary, REP8-016, item 5.1 (ii)].
- 2.1.2 The Applicant does not accept that the archaeological evaluation undertaken for the Scheme is inadequate. The evaluation strategy was developed in consultation with stakeholders and applied a combination of non-intrusive surveys and trial trenching in accordance with standard practice and guidance. The extensive use of trial trenching to validate Highways England’s geophysical surveys results contrasts with the very limited coring and lack of excavation in respect of the Durrington Walls discovery as described in the 2020 SHLP paper. The archaeological evaluation results, combining geophysical surveys with testing by trial excavation, form a robust baseline on which to make assessments of the impacts of the Scheme upon archaeological remains.

2.2 Development of the archaeological evaluation strategy

- 2.2.1 The development of the archaeological evaluation strategy adopted for the Scheme has benefited from continuing advice from the A303 Heritage Monitoring and Advisory Group (‘HMAG’), comprising representatives of Wiltshire Council and Historic England as statutory bodies, and the National Trust and English Heritage Trust as major landowners and managers within the WHS. The HMAG is supplemented by a Scientific Committee of independent experts, membership of which includes Professor Gaffney, the principal author of the 2020 SHLP paper on the Durrington Walls discovery, and Professor Parker Pearson, whose evidence to the Examination in relation to the DAMS is referred to by Mr Garwood (paragraph 4).
- 2.2.2 As stated in evidence given orally at hearings on 5 and 6 June 2019 [REP4-030, items 5 (i) and (ii)], the archaeological evaluation strategy was developed in consultation with HMAG and the Scientific Committee. Specific contributions from members of the Scientific Committee in respect of ploughzone artefact sampling (surface artefact collection and topsoil test pitting) were adopted as part of the evaluation strategy. The draft Archaeological Evaluation Strategy Report (AESR) and its accompanying

Overarching Written Scheme of Investigation (OWSI) were provided to the Scientific Committee for comment².

- 2.2.3 The AESR and OWSI were approved by Wiltshire Council and HMAG and guided the development by Highways England of Site Specific Written Schemes of Investigation ('SSWSIs'): these SSWSIs were approved, and their implementation on site monitored, by Wiltshire Council and, for sites within the WHS, HMAG. In her oral submission at hearings on 5 and 6 June 2019, the County Archaeologist, Ms Pomeroy-Kellinger confirmed Wiltshire Council's view that the evaluation programme was comprehensive and it is considered that enough information has come to light to give confidence going into the mitigation stage [REP4-030 item 5 (i),(ii)].
- 2.2.4 The results of the evaluations were reported in the Main ES [APP-044] and were taken into account in the identification of the baseline and approach to mitigation and in the assessment of likely significant effects in the ES. The detailed results of the evaluations were reported to the Examination at Deadline 1 [REP1- 039 – 056].

2.3 The evaluation strategy

Suitability of the strategy

- 2.3.1 In paragraph 5 of his statement, Mr Garwood contends that the results of the SHLP, "suggest research-quality methodologies are needed for all archaeological purposes in and around the WHS".
- 2.3.2 The archaeological field evaluation process set out in the AESR and OWSI combined non-intrusive geophysical surveys, ploughzone artefact sampling and trial trenching targeted to examine a range of geophysical anomalies, both those identified as of likely archaeological origin and those suggested to be of natural origin, and areas where the geophysics suggested an absence of archaeological remains. This combination of non-intrusive and intrusive techniques is standard archaeological practice and accords with the Chartered Institute for Archaeologists (CIfA) Standard and Guidance for archaeological field evaluation (CIfA 2020). Geoarchaeological and environmental sampling and scientific dating were undertaken as part of the evaluation process in consultation with qualified specialists, in accordance with the AESR and OWSI.
- 2.3.3 As described in paragraphs 2.2.1 to 2.2.3 above, the AESR and OWSI were developed in consultation with, and approved by, Wiltshire Council and HMAG, with advice from the Scientific Committee, with the WHS context of the work in mind. The suitability and comprehensiveness of the evaluation programme were confirmed in evidence by the County Archaeologist, Ms Pomeroy Kellinger on behalf of Wiltshire Council [REP4-

² The final approved versions of the AESR and OWSI are available through the Scientific Committee website: http://www.a303scientificcommittee.org.uk/images/documents/june2018/A303_Archaeological_Strategy1.pdf
[http://www.a303scientificcommittee.org.uk/images/documents/june2018/Overarching Written Scheme of Investigation for Archaeological Evaluation.pdf](http://www.a303scientificcommittee.org.uk/images/documents/june2018/Overarching_Written_Scheme_of_Investigation_for_Archaeological_Evaluation.pdf)

030, items 5 (i) and (ii)]. It is clear therefore that there is no deficiency in the scope or execution of the evaluation strategy.

Geophysical surveys

- 2.3.4 Four established geophysical survey techniques were employed – detailed magnetometer (gradiometer) survey across the full extent of the Scheme boundary, while targeted use of electrical resistance survey, ground penetrating radar (GPR) and electrical resistance tomography (ERT) served to further elucidate the results.
- 2.3.5 Detailed magnetometer (fluxgate gradiometer) survey was undertaken across the Scheme using a cart-based multi-sensor system, in accordance with a methodology set out in Written Schemes of Investigation (WSIs)³ approved by Wiltshire Council and HMAG, to a standard in line with Europae Archaeologiae Consilium (EAC) guidelines⁴. These included re-survey of areas on the Winterbourne Stoke Bypass that were surveyed for previous schemes, to ensure a common data standard across the Scheme. The only areas not included in the Highways England magnetometer survey were the fields within the WHS either side of The Diamond copse, for which data was made available by Historic England from their Southern WHS surveys published in 2015 and which was considered sufficiently thorough to rely upon⁵.
- 2.3.6 The detailed magnetometer surveys were complemented by the use of targeted electrical resistance and GPR surveys to investigate features of interest identified by the magnetometry. Features for GPR and earth resistance survey were selected (in consultation with heritage stakeholders) to confirm the interpretation of the magnetic anomalies of features associated with long barrows, round barrows and possible hengi-form monuments (all such features identified by the geophysical survey either lie outside the Scheme boundary or will be protected and retained in situ).
- 2.3.7 Within the WHS, the western portal survey area examined by detailed magnetometer survey was also subject to multi-channel GPR in order to provide area coverage within this part of the WHS comparable to the

³ The approved versions of the geophysics WSIs (Phases 1 to 3) are available through the Scientific Committee website:

http://www.a303scientificcommittee.org.uk/images/documents/june2018/PHASE_1_A303_AAJV_Wessex_Archaeology_Geophysical_Survey1.pdf

http://www.a303scientificcommittee.org.uk/images/documents/june2018/PHASE_2_A303_AAJV_Wessex_Archaeology_Geophysical_Survey1.pdf

http://www.a303scientificcommittee.org.uk/images/documents/june2018/PHASE_3_A303_AAJV_Wessex_Archaeology_Geophysical_Survey1.pdf

⁴ EAC Guidelines for the Use of Geophysics in Archaeology

Questions to Ask and Points to Consider: [https://f64366e3-8f7d-4b63-9edf-](https://f64366e3-8f7d-4b63-9edf-5000e2bef85b.filesusr.com/uq/881a59_fdb1636e95f64813a65178895aea87cf.pdf)

[5000e2bef85b.filesusr.com/uq/881a59_fdb1636e95f64813a65178895aea87cf.pdf](https://f64366e3-8f7d-4b63-9edf-5000e2bef85b.filesusr.com/uq/881a59_fdb1636e95f64813a65178895aea87cf.pdf)

⁵

<https://research.historicengland.org.uk/Report.aspx?i=15405&ru=%2fResults.aspx%3fp%3d1%26n%3d10%26t%3ddiamond%26ns%3d1>

<https://research.historicengland.org.uk/Report.aspx?i=15406&ru=%2fResults.aspx%3fp%3d1%26n%3d10%26t%3ddiamond%26ns%3d1>

Historic England surveys referred to above⁶. The results of multi-channel GPR survey of the eastern portal survey area within the Scheme boundary were included in data and an interpretive report released to Highways England by the SHLP (see 2.6.2 below). The additional survey undertaken by Highways England at the western portal survey area ensured that a comparable level of data was available across the principal Scheme impact areas within the WHS.

- 2.3.8 Beyond the WHS, electrical resistance tomography (ERT) was employed, following detailed magnetometer survey, to investigate colluvial sequences and a possible pond barrow or sinkhole north of Winterbourne Stoke [REP1-051]. This technique allowed 'pseudo-sections' across the dry valley deposit sequences to be developed. A borehole survey was employed to validate the ERT interpretation of the sequence across the possible pond barrow or sinkhole, suggesting a natural origin as a solution feature [REP1-051].

SSWSIs, external approvals and monitoring

- 2.3.9 The archaeological evaluation strategy set out in the AESR and OWSI required the preparation of a series of Site Specific Written Schemes of Investigation (SSWSIs) for approval by Wiltshire Council and, for sites within the WHS, HMAG. These SSWSIs provided a rationale for the number and location of trial trenches targeted to examine the range of possible features (both those identified as archaeological and those suggested to be natural) identified by the geophysical survey, and to test areas that were apparently 'blank' in the geophysical survey results. The implementation of the SSWSIs on site was monitored by Wiltshire Council and, for sites within the WHS, HMAG. Site visits were arranged to allow members of the Scientific Committee to view the evaluation works within the WHS at the eastern and western portal areas on three occasions.
- 2.3.10 Monitoring of the evaluation fieldwork by Wiltshire Council and HMAG included advice on and agreement of the extent of archaeological excavation within trial trenches. This approach was taken to ensure that archaeology that would be better excavated in the circumstances pertaining to open area excavation was not compromised, while still excavating and recording sufficient of the archaeology to allow a robust assessment of the nature and significance of the remains present.
- 2.3.11 The evaluation strategy applied appropriate techniques commensurate with the significance of the relevant heritage assets. The strategy recognised the WHS as an asset of the highest significance and ensured that a comparable level of geophysical data was available across the principal Scheme impact areas within the WHS.
- 2.3.12 Compliance with the approved AESR and OWSI was assured through submission of detailed SSWSIs for comment and approval by Wiltshire Council and, for sites within the WHS, HMAG, as outlined in 2.2.3 above.

6

http://www.a303scientificcommittee.org.uk/images/documents/june2018/Multi_channel_GPR_Geophysical_Report1.pdf

This approval process confirmed the acceptability and fitness for purpose of the techniques proposed for each evaluation area.

- 2.3.13 The Durrington Walls discovery lies outside of the Scheme boundary and therefore outside of the evaluation area (as distinct from the study area for the EIA and HIA⁷). The suggested large pit-like anomalies are similarly mostly outside the evaluation area. Within the evaluation area, the geophysical survey identified all of the anomalies highlighted by Mr Garwood. With the exception of one anomaly (see ES Addendum: anomaly 001), which lies within a later prehistoric enclosure [APP-212: UID 2039] that will not be impacted by the Scheme and was therefore deliberately excluded from the evaluation, the anomalies discussed by Mr Garwood in his statement were all subsequently tested by trial trenching and/or boreholes: the assessments made by Highways England are based on the results of these evaluations [REP1-041; REP1-042 & 043; REP-045 & 046; REP1-049 & 050; REP1-052 & 053].
- 2.3.14 As noted in 2.3.3 above, the evaluation strategy was confirmed as comprehensive in oral submissions by Ms Pomeroy Kellinger, on behalf of Wiltshire Council [REP4-030, items 5 (i) and (ii)].
- 2.3.15 It is therefore clear that the archaeological evaluation strategy developed for the Scheme is comprehensive and robust in both scope and application.

2.4 Quality of geophysical survey and interpretation: correlation with subsurface features

- 2.4.1 In his statement appended to the Consortium's submission, Mr Garwood asserts (paragraph 4), "... 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)".
- 2.4.2 The Applicant does not accept this assertion. A detailed analysis of the geophysical survey data [REP1-041] and trial trenching results [REP1-042 & 043; REP1-045 & 046; REP1-047 & 048] indicates that:
- a. Of 121 'features' (of all forms and sizes, both those identified as archaeological and those suggested to be natural) recorded during trial trenching across the Scheme, 108 corresponded to geophysical anomalies (89.26%) identified from the geophysical surveys; of these 108, 67 were confirmed to be archaeological features (62.04%);
 - b. Of the 121 'features', 75 were identified as archaeological (61.98%). Only eight archaeological features were not seen as geophysical

⁷ The ES study area comprised a corridor extending 500m from the Scheme boundary, encompassing land that would be subject to physical alteration, plus its immediate environs. High-value assets were identified on which there could be an impact upon setting, up to 2km beyond the 500m study corridor. The HIA study area comprised the whole of the Stonehenge part of the Stonehenge, Avebury and Associated Sites WHS and its setting. See ES Chapter 6 [APP-195], section 6.5 for more information.

anomalies in the geophysical surveys (6.66% of the 121 ‘features’); of these eight, two were ditches, three were pits and three were postholes.

- c. No postholes were identified as geophysical anomalies. This is not uncommon with magnetometer surveys, which are typically less effective at identifying small features than large pits and linear features. This was specifically catered for in the overall strategy as the magnetometer surveys were supported by trial trenching. This trial trenching provided the opportunity to assess the presence of such smaller features as well as to verify the interpretations of the geophysical anomalies more generally and allow an assessment of the numbers and nature of archaeological features likely to be present.

2.4.3 Mr Garwood continues (paragraph 4), “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”.

2.4.4 As stated above, review of the evaluation results demonstrates that across the Scheme, 89% of the ‘features’ revealed in the evaluation trenches corresponded with geophysical anomalies and only 6% of the ‘features’ confirmed as archaeological were not seen in geophysics. It is not correct, therefore, that the geophysical survey suggested very low numbers of features; rather, the figures demonstrate a good correlation between the geophysics results and the trial trenching results across the Scheme.

2.5 Interpretation of large pit-like features in the evaluation

2.5.1 Mr Garwood (paragraph 2) cites three large pit-like features described in the Highways England evaluation reports and suggests that these have not been recognised as possible “man-made” features. The Applicant notes that two of these features were identified by the geophysical surveys undertaken for the Scheme, and all three were investigated by trial trenching. All are interpreted as natural features on the basis of this detailed evaluation evidence. There is no evidence of these features being “man-made”.

2.5.2 Mr Garwood notes in paragraph 4 of his submission, “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”, in error. The magnetometer survey did identify the large pit/solution feature 24105 (anomaly 030), which corresponds with a ferrous response [REP1-045 & 046]. Trench 241 was targeted to investigate this and the nature of anomalies interpreted as superficial geological deposits associated with a shallow dry valley. Excavation and hand-augering within the trial trench concluded that 24105 was a solution feature in the shallow dry valley, with “clear evidence that people made use of the natural shelter provided by the part-infilled hollow, with in situ burning evident” [REP1-045 & 046] (paragraph 5.2.4), probably during the medieval period. The lower excavated portion of feature 24105 was infilled with redeposited natural deposits; no artefacts were recovered from these.

- 2.5.3 The evaluation report [REP1-045 & 046] notes that, “[24105] in Trench 241 fits well with interpretation as a solution hollow/small sink hole/doline and sits within a slight but noticeable topographic depression in the present land-surface, which supports this interpretation. The fills are consistent with a Holocene date and are colluvial in nature [...], although it is likely that Pleistocene Coombe Deposits are present at greater depth. Whilst activity within the hollow itself is evident, the feature will have acted as a natural capture-point for ploughed-in archaeological surface material, and this is reflected by the artefactual assemblage [material of Beaker (early Bronze Age), Roman and medieval date]”.
- 2.5.4 A further possible large pit suggested in Mr Garwood’s statement (paragraph 2) within the Scheme boundary was also identified by magnetometer survey [REP1-041] and investigated in the evaluation, through a combination of trial trenching and coring (anomaly 008 in Trench 448 north of Longbarrow crossroads) [REP1-042 & 043].
- 2.5.5 Trench 448 was located over the centre of a circular feature (8103), which was tentatively suggested from crop marks to be a ploughed down round barrow, one of two geophysical anomalies identified at this location (8103 and 8125) [REP1-042 & 043] (Figures 5, 10: Highways England, 2017). Two natural depressions were found and investigated by a combination of hand excavation, machine excavation and mechanical coring. The northern depression contained a homogenous colluvium and approximately 50 worked flint flakes, small quantities of burnt flint and Romano-British pottery, and the southern depression a complex stratigraphy including loessic deposits, coombe deposits and colluvium extending over more than 7m in depth. The report concluded, “The depressions identified within Trench 448 relate to topographic low points in the underlying chalk bedrock, both of which are believed to represent solution features resulting from dissolution of the chalk bedrock”. The southern solution feature has “acted as a capture point for a range of Pleistocene and Holocene deposits”. [REP1-042 & 043].
- 2.5.6 The third large pit-like feature cited by Mr Garwood (paragraph 2), feature 51224 in trench 512 lay beyond the area of geophysical survey undertaken for the Scheme. Geophysical survey data for the area provided by the SHLP (see 2.6.2 below) shows complex geological features and a scattering of magnetic responses. The interpretive report provided by SHLP does not identify a feature in this location; nor is a feature shown on figure 9 of the 2020 SHLP paper as reproduced by Mr Garwood.
- 2.5.7 The evaluation report [REP1-47 and 048] describes the results in paragraph 5.5.2: “A stony horizon (51222) lay under nearly 0.6 m of decalcified colluvium (51220 and 51221) infilling a natural hollow (51224) in Trench 512 (figs 11.18 and 11.21; plate 12.5). A coherent group of worked flint comprising primary knapping debris of Late Neolithic date, among which a small Mesolithic component (a bladelet and burin spall) is mixed, was recovered from deposit 51222. This stony horizon could represent a period of stasis within the continual slope process deposits, or it could be related to deflation i.e. when fine-grained material is lost/washed out from the colluvium leaving heavy inclusions (flint and artefacts) in a horizon at the

base of the colluvium. A very similar assemblage of worked flint, in terms of quantity and form, and also including a microlith of Mesolithic date, together with one sherd/15 g of Early Neolithic pottery and 5 g of Beaker pottery was recovered from overlying colluvium 51221. Worked flint comprising a scraper and six flakes was also recovered from the upper colluvial layer 51220. No finds were recovered from the underlying colluvium (51215), and therefore its date remains uncertain, as does its full extent”.

- 2.5.8 Feature 51224 is clearly interpreted as a natural hollow infilled with deposits derived from colluvium, and incorporating cultural material. No evidence for an anthropogenic origin was recorded. It lies outside of the Scheme boundary and will not be removed by the Scheme, although the underlying colluvial deposit 51215 may extend within the Scheme boundary.
- 2.5.9 In conclusion, therefore, all three features cited in Mr Garwood’s submission were thoroughly investigated in the evaluation. The evidence from the evaluation suggests that none of the three examples is likely to be a non-natural feature: that the features contain anthropogenic or cultural material does not of itself require a non-natural origin for the features. The evaluation reports, the ES, HIA and DAMS take full account of the potential for such features to contribute to understanding of human activity.
- 2.5.10 None of the three features would be impacted by the construction works. The features in Trenches 241, 448 and 512 lie outside of the construction footprint of the works. Trench 241 lies within DAMS Site 39, the topsoil here will be retained and the ground surface protected during construction by either surface protection measures (such as track matting) or fill material placed onto a separating membrane over the retained topsoil [TR10025-001951, pp. 358–359]. Trench 448 lies within DAMS Site 17.2 and will be protected by fencing incorporating a 10m buffer beyond the extent of the remains as mapped by the geophysical surveys [TR10025-001951, pp. 283–285]. The feature investigated within Trench 512 lies outside the Scheme boundary.

2.6 Reliability of the geophysical surveys

- 2.6.1 The Applicant notes that the Durrington Walls discovery is based on investigations in 2018 and 2019 of geophysical anomalies identified in surveys undertaken by the SHLP between 2010 and 2014⁸, and on the results of development-led archaeological investigations at Larkhill and Durrington.
- 2.6.2 The complete dataset from the SHLP surveys in 2010–2014, or more recently, has not been released into the public domain, for example through deposition of the data or interpretive reports with the Wiltshire and Swindon Historic Environment Record. As such, it has not been possible for the Applicant to review the underlying data that has supported the Durrington Walls discovery. The SHLP project did in 2018 provide to Highways England data and an interpretative report relating to a restricted study

⁸ <https://lbi-archpro.org/cs/stonehenge/surveys.html>

corridor, on a commercial basis and subject to an agreement not to distribute further: this report was fully considered by the Applicant in their preparation of the Environmental Statement.

- 2.6.3 It should be noted that the evaluation strategy employed on the Scheme, combining geophysics and trial trenching, is essentially the same as that employed at Larkhill in connection with the Army Basing Programme. This programme of work, designed and implemented with approval from Wiltshire Council, has successfully identified a new causewayed enclosure and a number of natural solution features, which the 2020 SHLP paper postulates may have formed part of a hypothesised 'northern arc' to the Durrington Walls discovery. It is evident, therefore, that these approaches are both acceptable and effective in identifying and investigating large pit-like features. It is also notable that the 2020 SHLP paper accepts that the solution features at Larkhill are of likely natural origin, as interpreted by the excavators, and acknowledges that such features can trap cultural material regardless of whether the features may have been of significance to human populations.
- 2.6.4 Geophysical survey is but one part of the evaluation strategy. The strategy provided for testing of the geophysical survey results through field evaluation – trial trenching, including environmental and geoarchaeological sampling, and coring of deeper features – to confirm the interpretation of the geophysical anomalies. The full picture of the evaluation results – not the geophysical surveys alone – has been taken into account in developing the DAMS (see section 5 below).

2.7 Conclusions

- 2.7.1 Contrary to Mr Garwood's proposition that, "There seems no reason, therefore, to have a degree of confidence in the geophysical survey work undertaken so far as a basis for Archaeological Mitigation Strategy decision-making", in our submission the archaeological evaluation results, combining geophysical surveys with testing by trial excavation, form a robust baseline on which to make assessments of the impacts of the Scheme upon archaeological remains [see the written summaries of the Applicant's oral submissions made at hearings on 5 and 6 June 2019, REP4-030, items 5 (i) and (ii)]. The robustness of the evaluation strategy is demonstrated by the approval by Wiltshire Council and (for sites within the WHS) HMAG of the AESR, OWSI and individual SSWSIs; and by the monitoring of the implementation of the strategy on site and approval of the resulting evaluation reports.

3 Robustness of the Heritage Impact Assessment (HIA)

3.1 Introduction

- 3.1.1 In the Consortium's representation [TR010025-001960], Ms Hutton contends (2.a(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".
- 3.1.2 The Applicant rejects this analysis. The relevant features affected by the Scheme were considered and a robust assessment of their significance reached, as set out above. The Applicant considers that the HIA submitted with the Application [APP-195] has been carried out accurately, in accordance with relevant guidance and good practice. The HIA Addendum demonstrates that the effect of the Scheme on the WHS as a whole, the Attributes of OUV, its Integrity and Authenticity, as assessed in the Main HIA submitted with the application, would be unchanged when taking into account the features referred to in the 2020 SHLP paper.

3.2 Conformance to guidance

- 3.2.1 The Heritage Impact Assessment (HIA) submitted with the DCO Application [APP-195] ('the Main HIA') was prepared in line with the Guidance on Heritage Impact Assessments for Cultural World Heritage Properties adopted by the International Council on Monuments and Sites (ICOMOS 2011) and considers the implications of the Scheme in the context of the Outstanding Universal Value (OUV) and the Authenticity and Integrity of the WHS.
- 3.2.2 The Main HIA [APP-195] assesses the impact of the proposed Scheme on the tangible heritage assets (identified by assessment of existing sources and previous surveys and through the evaluation strategy) and intangible aspects that convey Attributes of OUV. Attributes are aspects of a World Heritage property which are associated with or express the OUV: Attributes convey the OUV and allow an understanding of it. "In order to define the OUV of the WHS, a number of Attributes expressing the OUV have been identified in the 2015 WHS Management Plan⁹, derived from the Statement of Outstanding Universal Value (SoOUV). These are expressed by physical elements and tangible or intangible aspects that must meet the conditions of Integrity and Authenticity. Attributes are not themselves individually of OUV but together express the OUV of the site and define the reasons for its OUV." [APP-195, p. 5].
- 3.2.3 The ICOMOS Guidance notes that, "World Heritage properties need to be seen as single entities that manifest OUV. Their OUV is reflected in a range of attributes, and in order to sustain OUV it is those attributes that need to

⁹ (http://www.stonehengeandaveburywhs.org/assets/2015-MANAGEMENT-PLAN_LOW-RES.pdf)

be protected. Thus, the HIA process needs to consider the impact of any proposed project or change on those attributes, both individually and collectively, rather than on a standard range of receptors” (ICOMOS 2011, p. 1).

- 3.2.4 This was the approach taken in the HIA. The HIA Scoping Report (http://www.a303scientificcommittee.org.uk/images/documents/june2018/Heritage_Impact_Assessment_Scoping_Report1.pdf) was discussed and agreed with HMAG and formed part of the Briefing Pack issued to the 2018 Joint World Heritage Centre / ICOMOS Advisory Mission. The Advisory Mission Report (<https://whc.unesco.org/document/168265>) considered that the methodology outlined in the HIA Scoping was appropriate.

3.3 HIA addendum – scope

- 3.3.1 The Applicant considers that the HIA has been carried out accurately and with a full appreciation and understanding of the importance of the WHS and its OUV, and having appropriate regard to the previous archaeological work in the WHS, as well as the results of the archaeological evaluations. However, the Applicant acknowledges the Durrington Walls discovery and although the Applicant expects that the SHLP 2020 paper will be the subject of widespread discussion and debate within the archaeological community, as well as future research, to aid the Secretary of State the Applicant has nevertheless taken the conclusions of the SHLP 2020 paper at face value and an HIA Addendum, specifically addressing the new discovery on that basis, has been prepared to complement the existing HIA.
- 3.3.2 The HIA Addendum focuses on the nature of the Durrington Walls discovery, its contribution to the Attributes expressing the Outstanding Universal Value (OUV) of the WHS, Integrity and Authenticity; its relationship to known heritage assets, Asset Groups and the WHS landscape; and the distribution and potential significance of other pit-like geophysical anomalies in the WHS landscape and beyond. It assesses the impacts and effects of the Scheme on the Durrington Walls discovery, on known heritage assets potentially related to the discovery, and on pit-like anomalies highlighted by the Consortium’s submission elsewhere in the WHS and within the DCO boundary. The HIA Addendum assesses the impacts and effects of the Scheme on the Attributes of the OUV of the WHS and on the Integrity and Authenticity of the World Heritage Site (WHS). This includes assessment of the setting and relationships between the monuments, including the newly-published features, within the visual envelope of the WHS. It:
- a. assesses the significance of the Durrington Walls discovery in terms of its contribution to Attributes expressing the Outstanding Universal Value (OUV) of the WHS, Authenticity and Integrity, and assesses potential Scheme impacts upon their fabric and setting, in accordance with ICOMOS Guidance on HIA (ICOMOS 2011);
 - b. considers the temporal and spatial relationships of the Durrington Walls discovery with known archaeological assets and Asset Groups,

- topographical aspects, landscape layout and astronomical alignments of the WHS; and
- c. considers the character, interpretation and distribution of other large pit-like geophysical anomalies in the landscape, particularly those located within the DCO boundary and in the immediate vicinity of the Scheme.
- 3.3.3 The HIA Addendum considers the interrelationships between the Durrington Walls discovery and other monuments and landscape expressing Attributes of OUV asserted in the SHLP 2020 paper. These monuments comprise the following Asset Groups (AG): Stonehenge (AG22), Durrington Walls, Woodhenge and Associated Sites (AG33), Larkhill Causewayed Enclosure (AG39), the Greater Cursus (AG23), Coneybury Henge and Associated Monuments (AG29). The HIA Addendum also considers the Wilsford Shaft, a designated discrete asset conveying Attributes of OUV of WHS (UID 2016; NHLE 1010833) and isolated pits, pit groups, natural and geological features in the landscape.
- 3.3.4 The assessment includes consideration of natural features with evidence for human use and presence of material culture and material dated to the Neolithic and Bronze Age; the interplay between geology, topography, the development of the prehistoric landscape and the distribution of monuments; and potential visual relationships and inter-visibility of these areas with each other.
- 3.3.5 The HIA Addendum also considers the contribution of the Durrington Walls discovery to other aspects of the WHS, including tourism and the visitor experience; public understanding of OUV; public visibility of monuments from the current A303; archaeoastronomical aspects; and intangible cultural heritage, including spiritual aspects and cultural influences.

3.4 HIA Addendum – outcomes

- 3.4.1 The HIA Addendum concludes that the Scheme will not have any significant impact on the Durrington Walls discovery. It will not result in any *direct physical impacts* on the suggested pit circuit or any associated subsurface deposits, or upon its inferred associations and interrelationships with other monuments and Asset Groups in the landscape. Impacts on the *setting* of the Durrington Walls discovery will be limited due to the separating distance, the dominating presence of the existing A303, the low baseline quality of the setting and the intervening topography.
- 3.4.2 Large pit-like anomalies within the Scheme boundary identified via geophysical survey and evaluation are already assessed in the Main ES and Main HIA as isolated and discrete non-designated heritage assets. Where not physically impacted by the Scheme, these will be preserved in situ as set out in the DAMS [TR10025-001951]. Where any such features would be removed by the Scheme, they will be subject to archaeological excavation and recording in accordance with the DAMS (see section 5 below).

- 3.4.3 The HIA Addendum has confirmed that six features in the ‘southern arc’ of the Durrington Walls discovery, and the features suggested to form the ‘northern arc’, are ‘new’ features that were not part of the baseline assessed in the Main HIA. The HIA addendum has assessed all of the pit-like anomalies forming the Durrington Walls discovery, whether previously assessed or ‘new’ features, and finds no change to the conclusions of the Main HIA.
- 3.4.4 Taking into account the Durrington Walls discovery, the HIA Addendum concludes that the discovery does not change the assessment of Scheme impacts on the WHS as a whole set out in the Main HIA.

3.5 Conclusions

- 3.5.1 The Main HIA submitted with the Application [APP-195] has been carried out accurately and with a full appreciation and understanding of the importance of the WHS and its OUV, and having appropriate regard to the previous archaeological work in the WHS, as well as the results of the archaeological evaluations. The Main HIA considered all relevant features robustly. The HIA Addendum prepared to complement the Main HIA assesses the significance of the Durrington Walls discovery and its contribution to the OUV of the WHS and concludes no change to the to the assessment of Scheme impacts on the WHS as a whole in the Main HIA. The HIA Addendum demonstrates that the Scheme will not adversely affect the physical remains of the suggested monumental structure, or its setting.
- 3.5.2 The suggested discrete large pit-like anomalies across the landscape outside of the Scheme boundary will not be physically impacted by the Scheme: those that lie within the Scheme boundary will either be protected and retained in situ, or archaeologically excavated and recorded. There would be no impact on OUV due to the effects of the Scheme on these pit-like anomalies.
- 3.5.3 The effect of the Scheme on the WHS as a whole, the Attributes of OUV, its Integrity and Authenticity, as assessed in the Main HIA submitted with the application, is unchanged.

4 Environmental Statement: Cultural Heritage Assessment

4.1 Introduction

- 4.1.1 In the Consortium's submission [TR010025-001960], Ms Hutton contends (9) that, "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".
- 4.1.2 The Applicant rejects this analysis. The Applicant considers that the EIA submitted with the Application [APP-044] has been carried out accurately, having appropriate regard to the previous archaeological work in the WHS, as well as the results of the archaeological evaluations. The ES Addendum has not identified any new likely significant effects beyond those already identified in the Main ES.

4.2 Conformance to guidance

- 4.2.1 The ES submitted with the Application assesses the likely cultural heritage effects of the construction and operation of the Scheme in Chapter 6 [APP-044]. The assessment followed the methodology set out in the Design Manual for Roads and Bridges ("DMRB") Volume 11, Section 3, Part 2 (HA208/07¹⁰; Ref 6.1). The HIA (discussed above; [APP-195]) formed Appendix 6.1 of the ES chapter; the results of the HIA were summarised in the ES chapter (section 6.11).
- 4.2.2 Relevant legislation and policy are set out in the ES and its relevant appendices and annexes (Highways England, October 2019). In accordance with the National Planning Policy Framework (NPPF), the National Policy Statement for National Networks ('the NPS') policies relating to the Applicant's assessment are the primary source of policy guidance. The NPS has not been updated since submission of the Application. The NPPF was revised in February 2019, but the requirements which relate to the Applicant's assessment have not substantively changed, and the NPS remains the primary source of policy guidance.
- 4.2.3 National Planning Practice Guidance (PPG) published by the Ministry of Housing, Communities and Local Government was updated in July 2019. The requirements which relate to the ES submitted with the Application have not substantively changed, and again, the NPS remains the primary source of policy guidance.

¹⁰ This guidance has since been superseded by DMRB LA 104 Environmental assessment and monitoring and LA106 Cultural heritage assessment. Assessment methods and outcomes would not be changed in light of the new guidance.

4.3 ES Addendum – scope

- 4.3.1 The Applicant considers that the EIA has been carried out accurately, in full compliance with the EIA Regulations (2017)¹¹ and, through the comprehensive HIA discussed in section 3 above, with a full appreciation and understanding of the importance of the WHS and its OUV. However, as stated in section 3 above, the Applicant acknowledges the Durrington Walls discovery and although the Applicant expects that the SHLP 2020 paper will be the subject of widespread discussion and debate within the archaeological community, as well as future research, to aid the Secretary of State, the Applicant has nevertheless taken the conclusions of the SHLP 2020 paper on the discovery at face value and an ES Addendum has been prepared on that basis to complement the Main ES [APP-044].
- 4.3.2 The ES Addendum follows the methodology adopted for the Main ES [APP-044, section 6.3] and considers the nature of the Durrington Walls discovery, and the suggested discrete and isolated pit-like anomalies across the landscape, as heritage assets and, where relevant, as part of Asset Groups; and assesses their significance within the context of the WHS landscape and beyond. It provides an update to baseline conditions, describing the Durrington Walls discovery, following the account published in the 2020 SHLP paper.
- 4.3.3 The significance of the Durrington Walls discovery is assessed and its relationship to Asset Groups assessed in the Main ES is considered. The ES Addendum concludes that the ‘southern arc’ of geophysical anomalies have the potential to contribute to the OUV of the WHS and are therefore assessed as of Very High Value. The other large pit-like anomalies put forward in the article are considered separately: those that lie within the Scheme boundary are considered in detail, on the basis of data available in the Wiltshire and Swindon Historic Environment Record (WSHER), or geophysical survey data captured by the evaluations or published by Historic England. The assessment concludes that the features range from uncertain or unknown significance where there is insufficient evidence to reach a reasoned conclusion, to Medium (regional) significance where the features have clear potential to capture or incorporate cultural material. Those anomalies identified in the 2020 SHLP paper (figure 9) and by Mr Garwood (figure 2) that will not be physically impacted or have their settings changed by the Scheme are not assessed.

4.4 Scheme effects

- 4.4.1 The ES Addendum assesses the impacts and likely significant effects of the construction and operation of the Scheme on the Durrington Walls discovery, on heritage assets potentially related to the discovery, and on large pit-like anomalies identified within or in the vicinity of the Scheme boundary. The significance of effect of the Scheme on the new discovery

¹¹ UK Statutory Instrument 2017 No. 571 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Available at: https://www.legislation.gov.uk/ukSI/2017/571/pdfs/ukSI_20170571_en.pdf

and relevant isolated and discreet features is assessed following the methodology in the Main ES.

- 4.4.2 The ES Addendum has not identified any new likely significant effects beyond those already identified in the ES submitted with the Application.
- 4.4.3 There would be no direct, permanent physical impact on any part of the Durrington Walls discovery, or upon related sub-surface deposits, due to the Scheme. There would be a Slight adverse temporary effect on the setting of the 'southern arc' due to the construction of the eastern portal.
- 4.4.4 With regard to the discrete and isolated anomalies suggested in the 2020 SHLP paper, the temporary adverse construction effects on anomalies within Asset Group AG31, Countess Farm barrows, would be Slight adverse, as reported within the Main ES. Similarly, impacts on anomalies close to the Western Portal Approach Cutting and the Longbarrow Compound would be limited to Slight adverse. Of the anomalies shown in the 2020 SHLP paper figure 9 and in Mr Garwood's figure 2 within the Scheme boundary, only one (anomaly 002) would be physically impacted by the Scheme; the residual effect of loss of the feature is assessed as Moderate adverse following mitigation by archaeological excavation and recording as proposed in the DAMS [TR10025-001951], as reported in the Main ES. Other possible pit-like anomalies outside the Scheme boundary will not be affected by the Scheme. There will be no physical impacts on the three pit-like features cited by Mr Garwood in his paragraph 2, which will be retained in situ within the Scheme boundary (or, in the case of solution hollow 51224, lie outside the Scheme boundary).
- 4.4.5 There would be no additional adverse effect on the settings of the Durrington Walls discovery due to the operation of the Scheme.
- 4.4.6 Only one of the residual effects is assessed as Moderate adverse and as stated above this is already reported in the Main ES. All others are no greater than Slight adverse, and therefore are not defined as likely significant effects under the ES methodology.

4.5 Conclusions

- 4.5.1 The Scheme will not adversely affect the physical remains of the suggested "monumental structure", or its setting, or the suggested discrete large pit-like geophysical anomalies across the landscape outside of the Scheme boundary; those suggested within the Scheme boundary will either be protected and retained in situ, or archaeologically excavated and recorded, as proposed in the DAMS [TR10025-001951] (see section 5 below) and already assessed in the Main ES [APP-044].

5 Detailed Archaeological Mitigation Strategy (DAMS): fitness for purpose

5.1 Introduction

- 5.1.1 In the Consortium's submission [TR010025-001960], Ms Hutton (2 (b)) contends that, "the discovery renders the Detailed Archaeological Mitigation Strategy ('DAMS') profoundly out of date". In his appended statement, Mr Garwood (5) claims that the DAMS is "not fit for purpose".
- 5.1.2 The Applicant rejects both these analyses, which fail to appreciate the purpose of the DAMS [TR10025-001951], its Archaeological Research Agenda ('ARA'), and the mechanisms it provides to ensure a flexible response to the archaeological resource that addresses relevant research questions.

5.2 Purpose of the DAMS and the Archaeological Research Agenda

- 5.2.1 The purpose of the DAMS is to address and set out an appropriate response to the preservation of remains in situ where possible, and to set out the detail of the archaeological mitigation where that is not possible. The DAMS considers the different impacts, relevant mitigation principles and methods through the full archaeological process, both on and off site. The DAMS includes a detailed consideration of these aspects and relevant research themes and questions in respect of each of the mitigation areas identified in Part 4 of the document. The approach of the DAMS is based on developing site-specific research questions and focusing site decision making on addressing these.
- 5.2.2 The Archaeological Research Agenda (ARA) set out at section 4 of the DAMS has been developed in consultation with HMAG and the Scientific Committee, and considers the archaeological evidence identified during the evaluation programme and known from other published surveys in the area against the themes and research questions set out in relevant published research frameworks. These include the Stonehenge and Avebury Archaeological Research Framework (SAARF), the South West Archaeological Research Framework (SWARF), and selected period-specific research agendas.
- 5.2.3 The purpose of the ARA is to guide the development of SSWSIs based on the archaeological mitigation strategy set out in Part 1 of the DAMS and the OWSI (Part 2 of the document). It is not an attempt to define a research strategy covering all aspects of archaeological evidence in the WHS and its environs.
- 5.2.4 The Applicant understands that Wiltshire Council and Historic England consider that the DAMS and its ARA provide an adequate basis for development of site-specific research questions and SSWSIs. Historic England's closing submission [AS-111] confirms, "We believe that the

dDCO, OEMP and DAMS set out a process to ensure that heritage advice and considerations can play an appropriate and important role in the construction, operation and maintenance of the Scheme [...] we consider sufficient safeguards have been built in for the detailed design stage”.

5.3 Provision for development of the DAMS and site-specific approaches

- 5.3.1 The DAMS [TR10025-001951] has been purposely developed, in consultation with HMAG and the Scientific Committee, to provide the scope to accommodate a range of approaches and the flexibility to address emerging discoveries.
- 5.3.2 For each site or area of archaeological interest, an SSWSI will set out specific measures that will apply to particular pieces of archaeological fieldwork, to be carried out as part of the programme of archaeological mitigation works. The SSWSIs are required to develop relevant research questions and methodological approaches based on the DAMS, in consultation with Wiltshire Council and Historic England and for sites within the WHS, HMAG, for approval by Wiltshire Council (in consultation with Historic England).
- 5.3.3 To support the development of SSWSIs, the DAMS also requires the development of a series of specialist strategies, in consultation with stakeholders, including the Scientific Committee. These strategies include a geoarchaeological strategy, development of which offers the opportunity to address the potential of natural features and deposits to inform on the development of the landscape, and to set out a strategy for investigation and recording of these.
- 5.3.4 The Applicant proposes to hold a series of collaborative technical workshops following selection of the Archaeological Contractor, in order to consult the Scientific Committee and HMAG experts in developing further the site-specific research questions and specialist strategies that will feed into the content of the SSWSIs submitted to Wiltshire Council for approval. These workshops will also provide opportunity for the Scientific Committee to advise on the development of the ARA and relevant site-specific research questions to address new discoveries.
- 5.3.5 The DAMS provides at paragraph 6.1.24 for an iterative site strategy for excavation, artefact recovery and for sampling to be agreed with Wiltshire Council, Historic England and for sites within the WHS, HMAG, at a site consultation meeting. This provision allows for on-site decisions to accommodate discoveries, in consultation with stakeholders, including the methodological approach and the extent of excavation and sampling appropriate to the potential significance of the features or deposits encountered. The provision in section 7 of the DAMS for an ongoing programme of scientific sampling and dating, and continuous feedback of the results to the field teams, is intended to inform and support iterative development of the site strategy.

- 5.3.6 With regard to the potential to identify large, pit-like features of the type postulated by Mr Garwood, the DAMS provides at 6.3.24 for additional targeted geophysical survey following topsoil stripping, in order to enhance recognition of features, validate the previous geophysical surveys and provide a check on the visual identification of potential archaeological features. The use of detailed magnetometer survey, GPR, electrical resistance survey and electromagnetic induction will be considered in consultation with Wiltshire Council and Historic England and, for sites within the WHS, HMAG.
- 5.3.7 The DAMS provides at paragraphs 6.1.19 to 6.1.21 for unexpected finds (sites, artefacts, environmental remains or ecofacts, monuments or features) that may be made during the course of the project, and provides for a procedure for dealing properly with any unexpected finds to be set out in each approved SSWSI, and in the Construction Environmental Management Plans to be prepared by the works contractors in consultation with Wiltshire Council and Historic England and, for sites within the WHS, HMAG, and approved by the Secretary of State.

5.4 Impacts on pit-like anomalies

- 5.4.1 Ms Hutton's suggestion (7) that some of the pit-like anomalies will be "destroyed" is simplistic; any such features that are identified within the Scheme construction footprint will either be protected during the works and retained in situ or, where this is not possible, they will be subject to detailed, professional archaeological investigation, reporting and prompt public dissemination of factual and interpretative information. The investigation and recording strategy for such features, including provision for systematic palaeoenvironmental sampling and scientific dating, is set out in the DAMS [TR10025-001951] and will be expanded within the relevant SSWSIs to be prepared by the archaeological contractor and approved by Wiltshire Council (in consultation with Historic England and for sites within the WHS, HMAG).
- 5.4.2 Mr Garwood's statement appended to the Consortium's submission notes (paragraph 2), "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)".
- 5.4.3 Mr Garwood also asserts in his paragraph 3 that Highways England recommend, "only minimal future sampling in the DAMS". This is not correct. The DAMS [TR10025-001951] already provides for the investigation of these and other such features, where impacted by construction. Paragraph 6.3.42 states (emphasis added), "Within the WHS, pits, post-holes and other isolated features (including natural features that

have been shown to contain archaeological remains) will be completely (100%) excavated (unless otherwise agreed in consultation with Wiltshire Council, Historic England and, for sites within the WHS, HMAG). Outside the WHS, these types of feature will normally be completely (100%) excavated (unless otherwise agreed in consultation with Wiltshire Council, Historic England and, for sites within the WHS, HMAG as part of the iterative process) (see paragraph 6.1.24 and section 8.1); half-sectioning of features may be adopted, in consultation with Wiltshire Council, subject to the significance of the remains and the research questions identified in the SSWSIs. The significance of the remains and their potential to contribute to the OUV of the WHS will be considered in consultation with Wiltshire Council and Historic England (and, for sites within the WHS, HMAG) in determining the sample size to be excavated”.

- 5.4.4 This DAMS provision ensures that solution hollows or other natural features encountered during the mitigation programme and shown to contain archaeological remains will be subject to archaeological investigation.
- 5.4.5 With regards to the specific examples within the Scheme boundary cited by Mr Garwood, these will not be removed by construction activities. Probable solution hollow 24105 is located beyond the footprint of the western approach cutting, and 44807/44828 lies outside the footprint of the realigned A360 North link road in an area where there will be no Scheme impact. To the north of the Eastern Portal approach road is a natural hollow (51224), sampling of which yielded an assemblage of worked flints of Late Neolithic date. This hollow lies outside the Scheme boundary, and will therefore not be removed by construction activities.

5.5 Conclusions

- 5.5.1 The DAMS provides a comprehensive strategy for the mitigation of impacts on archaeological remains, and is fit for purpose both as the basis for the development of Heritage Management Plans and Method Statements, which together provide the mechanism by which site works that could affect the historic environment will be controlled; and for the development and implementation of SSWSIs. The DAMS provides for site-specific research questions to be developed with input from specialists, for natural features containing cultural material to be fully excavated, and for iterative development of strategies on site that respond to the nature and significance of the features encountered. The Applicant considers that these provisions provide ample scope to address discoveries during the mitigation programme, and to take account of new research within the WHS.
- 5.5.2 The provisions in the DAMS outlined in paragraphs 5.3.1 to 5.3.7 above allow scope to accommodate a range of approaches and the flexibility to take account of emerging discoveries, including the potential for large pit-like features within the Scheme boundary and their possible significance.
- 5.5.3 With regard to the latter, the Applicant’s view is that the DAMS takes appropriate account of the large features that were identified in the

archaeological evaluation, *contra* Mr Garwood's representation: references to the specific features cited by Mr Garwood and the approach to archaeological mitigation for them (as discussed above) are set out in DAMS Appendix D, Sites 19, 24 and 29. Where such features are encountered within the construction footprint, and will therefore be removed by the Scheme, as noted above (para.5.4.3), the DAMS already provides for 100% excavation of pits, post-holes and other isolated features (including natural features that have been shown to contain archaeological remains).

6 Conclusions

6.1 Robustness of assessments

- 6.1.1 The Applicant considers that the Application documents, and specifically the HIA, ES and DAMS, are comprehensive and have been correctly prepared in accordance with relevant guidance and good practice.
- 6.1.2 The Applicant recognises the WHS as a single asset of the highest significance – see written summaries of oral submissions put at Cultural Heritage hearings on 5 and 6 June 2019 [REP4-030, items 3 (ii) and (vi)]. The HIA and ES submitted with the Application assess the impact of the Scheme accordingly and assign the WHS the highest level of significance ('Very High' – applicable to WHS and features conveying attributes of OUV).
- 6.1.3 The Applicant has considered the contribution of the Durrington Walls discovery and the pit like anomalies to the OUV of the WHS and the impact of the Scheme on the discovery and the anomalies. The Applicant has prepared an Addendum to the HIA that specifically considers the discovery and its significance, its contribution to the Attributes, Integrity and Authenticity of the WHS, and the impact of the Scheme on the OUV of the WHS as a whole (taking into account the discovery and anomalies), and an Addendum to the ES that assesses the impacts and Likely Significant Effects of the construction and operation of the Scheme on the new discovery, heritage assets potentially related to the discovery, and pit-like anomalies identified elsewhere in the WHS and within the DCO boundary.
- 6.1.4 The Scheme will not adversely affect the physical remains of the suggested monumental structure, or its setting. The suggested discrete large pit-like anomalies across the landscape outside of the Scheme boundary will similarly be unaffected by the Scheme; those suggested within the Scheme boundary will either be protected and retained in situ, or archaeologically excavated and recorded.
- 6.1.5 The HIA Addendum demonstrates that the effect of the Scheme on the WHS as a whole, the Attributes of OUV, its Integrity and Authenticity, as assessed in the Main HIA submitted with the application, would be unchanged. The ES Addendum has not identified any new likely significant effects beyond those already identified in the Main ES submitted with the Application.

6.2 Adequacy of the evaluation strategy and the DAMS

- 6.2.1 Mr Garwood previously submitted evidence to the Examination in relation to the adequacy of the evaluation strategy and the DAMS [REP7-054]: his statement appended to the Consortium's representation reprises this evidence, contending that the Durrington Walls discovery and the suggested similar pit-like anomalies support this earlier evidence.

- 6.2.2 The archaeological evaluation undertaken for the Scheme has successfully identified and investigated the large pit-like features within the Scheme boundary that are cited by Mr Garwood. The Applicant considers that the interpretation of these features as of natural origin (but containing cultural material) is sound, based on the evidence from the evaluations. As far as any additional or wider interpretation that might be entertained in light of the recently published discovery, the interpretation as natural features does not preclude anthropogenic modification and the mitigation strategy for the Scheme allows flexibility to investigate and interpret such features further, taking account of the Durrington Walls discovery.
- 6.2.3 The evaluation strategy was developed in consultation with HMAG and the Scientific Committee, and it and the detailed SSWSIs flowing from it were approved by Wiltshire Council and HMAG. Its implementation was monitored on site by Wiltshire Council and HMAG. As to the best available data, the Applicant notes that the complete SHLP dataset was (and is) not available as a source of data for the assessments undertaken for the Scheme (see 2.6.2 above). Furthermore, it is evident from the results of the geophysics and trial trenching employed at Larkhill and Durrington in connection with the Army Basing Programme – which are the same as the Scheme evaluation strategy – that these approaches are both acceptable and effective in identifying and investigating large pit-like features.
- 6.2.4 With regard to the DAMS [TR10025-001951], the DAMS and its ARA provide a comprehensive strategy for the mitigation of impacts on archaeological remains. The DAMS provides for development of site specific research questions with input from specialists through SSWSIs; for natural features containing cultural material to be fully (100%) excavated; and for iterative development of strategies on site to respond to the nature and significance of the features encountered.
- 6.2.5 In a WHS landscape subject to intensive continuing research, new discoveries are to be expected; the DAMS provisions provide ample scope to address discoveries during the mitigation programme, and to take account of emerging discoveries and theories within the WHS. The DAMS is therefore fit for purpose. Wiltshire Council, Historic England and the National Trust all expressed satisfaction that the DAMS formed an adequate basis for development of research questions and SSWSIs to mitigate the impact of the Scheme on archaeological remains.

6.3 NPS and WHC compliance

- 6.3.1 The Applicant has previously responded, in detail, on the Scheme's compliance with the World Heritage Convention (WHC), including with articles 4 and 5 of the WHC – please see, for example:
- the Applicant's response to ExA's Written Questions – General and Cross-topic G.1.1 [REP2-021];
 - the Applicant's Comments on Written Representations [REP3-013], particularly paragraphs 21.4.8-21.4.16 in response to the Council for

British Archaeology and paragraphs 60.2.33-60.2.36 in response to the Blick Mead Project Team;

- the Applicant's Comments on Any Further Information received at deadline 4 [REP5-003], particularly item 11.2.25 in response to the Stonehenge Alliance;
- the written summaries of oral submissions put at Cultural Heritage hearings on 5 and 6 June 2019, particularly in response to agenda items 3(i), 3(v), 3(vi) and appendix A [REP4-030]; and
- finally, the written summaries of oral submissions put at Cultural Heritage hearings on 21 August 2019, particularly in response to agenda items 3.1(i) and 3.2(ii) [REP8-016].

6.3.2 The Applicant does not consider that the findings of the 2020 SHLP paper – which are considered in detail in the ES and HIA Addenda and concluded not to result in new likely significant effects or impacts on the WHS as a whole – or the submissions of the Blick Mead Project Team, Consortium of Archaeologists or the Stonehenge Alliance on 25 and 26 June 2020 raise any issues that bring into doubt or would cause a change to the Applicant's previous submissions on this point. The Scheme does not breach the WHC and is in full compliance with the UK's international legal obligations.

6.3.3 The conclusions presented in the HIA Addendum and ES Addendum show that the Scheme maintains conformity with the NPS. As such, it has not been considered necessary to update the National Policy Statement for National Networks Compliance Tracker [AS-142]. This is on the basis that the HIA Addendum concludes that the discovery does not change the assessment of Scheme impacts on the WHS as a whole set out in the Main HIA and the ES Addendum has not identified any new likely significant effects beyond those already identified in the Main ES.

6.4 Secretary of State's request for information

6.4.1 This document responds to the representations made by the Consortium of Archaeologists and the Blick Mead Project Team, and the Stonehenge Alliance.

6.4.2 With regard to the Secretary of State's request for information, Addenda to both the ES and the HIA for the Scheme conclude that there is no change to the conclusions of the ES or the HIA on likely significant effects and impacts on the WHS as a whole following the new discovery. It follows that there are no "implications [...] for the Development and any harm it may cause to the World Heritage". Similarly, for the reasons set out in this document and the Addenda, the Environmental Statement, including the Heritage Impact Assessment, and the proposed Detailed Archaeological Mitigation Strategy remain robust.

Abbreviations List

AESR	Archaeological Evaluation Strategy Report
AG	Asset Group
ARA	Archaeological Research Agenda
CIfA	Chartered Institute for Archaeologists
DAMS	Detailed Archaeological Mitigation Strategy
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ERT	Electrical Resistance Tomography
ES	Environmental Statement
GPR	Ground Penetrating Radar
HIA	Heritage Impact Assessment
HMAG	Heritage Monitoring and Advisory Group
ICOMOS	International Council on Monuments and Sites
NHLE	National Heritage List England
NPPF	National Planning Policy Framework
NPSNN	National Policy Statement for National Networks
OUV	Outstanding Universal Value
OWSI	Overarching Written Scheme of Investigation
SAARF	Stonehenge and Avebury Archaeological Research Framework
SHLP	Stonehenge Hidden Landscapes Project
SSWSI	Site Specific Written Scheme(s) of Investigation
SWARF	South West Archaeological Research Framework
UID	Unique Identifier
WSHER	Wiltshire and Swindon Historic Environment Record
WHC	World Heritage Convention
WHS	World Heritage Site

Glossary

Archaeological Mitigation - action(s) taken to reduce or ameliorate the potential of impact/damage to a heritage asset through avoiding development, a design solution, or recording in advance of any impacts.

Heritage Monitoring and Advisory Group (HMAG) - members of HMAG are Historic England and Wiltshire Council as statutory consultees and the National Trust and English Heritage as major landowners and heritage managers in the WHS. HMAG has been convened to advise Highways England on archaeological evaluation, assessment and mitigation on matters relating to the WHS and its Outstanding Universal Value (OUV). HMAG is further advised by a Scientific Committee of independent specialists and experts.

Wiltshire Council - in addition to Wiltshire Council's membership of HMAG, Wiltshire Council also has a statutory role in relation to archaeological works for the entire Scheme for the local planning authority and statutory responsibility for sign off for archaeological works and approval of SSWSIs, Heritage Management Plans and Method Statements.

References

- [1] V. e. a. Gaffney, "A Massive, Late Neolithic Pit Structure associated with Durrington Walls Henge," *Internet Archaeology*, vol. 55, 2020.

Appendices

Appendix A

A.1 Responses to points raised in representations from the Consortium of Archaeologists and the Blick Mead Project Team

Representation	Response
<p>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’). 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.</p>	<p>The Applicant has carefully considered the Durrington Walls discovery and the large pit-like anomalies suggested to be of similar nature and import. The Applicant notes that the discovery is not proven as a ‘A Massive, Late Neolithic Pit structure’. The paper puts forward a number of assertions and hypotheses on a preliminary basis. No doubt these will be the subject of widespread discussion and debate within the archaeological community, as well as future research. To aid the Secretary of State, the Applicant has nevertheless taken the preliminary conclusions of the publication on the discovery at face value and considered them in Addenda to the both the ES and the HIA for the Scheme. As set out in more detail below, those Addenda conclude that even if the conclusions of the publication are correct, there is no change to the conclusions of the ES or the HIA on likely significant effects and impacts on the WHS as a whole respectively.</p>
<p>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:</p> <p>2.a(i). the discovery undermines the heritage assessments conducted by Highways England (‘HE’) [...]</p>	<p>The Applicant does not agree that the discovery has ‘significant implications for the decision over whether to grant development consent’ for the proposed Scheme.</p> <p>The heritage assessments conducted by the Applicant in support of the Scheme are comprehensive and have been prepared in accordance with relevant guidance and good practice: DMRB Volume 11, Section 2, Part 5 (HA205/08) and Volume 11, Section 3, Part 2 (HA208/07), ICOMOS Guidance on Heritage Impact Assessments in Cultural World Heritage</p>

	<p>Properties (2011), Historic England Good Practice Advice Note GPA 3: The Setting of Heritage Assets (2017).</p> <p>In order to verify that the Durrington Walls discovery and its implications do not alter the conclusions of the HIA, the Applicant has prepared an Addendum to the HIA (taking the preliminary conclusions of the paper at face value) that specifically considers the discovery and its significance, its contribution to the Attributes, Integrity and Authenticity of the WHS, and the impact of the Scheme on the Durrington Walls discovery and on the OUV of the WHS as a whole.</p>
<p>2.a(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;</p>	<p>The Applicant notes that the discovery is based on investigations in 2018 and 2019 of geophysical anomalies identified in surveys undertaken by the Stonehenge Hidden Landscape Project (SHLP) between 2010 and 2014 (see https://lbi-archpro.org/cs/stonehenge/surveys.html), and on the results of development-led archaeological investigations at Larkhill and Durrington.</p> <p>The complete dataset from the SHLP surveys in 2010–2014 or more recently has not been released into the public domain, for example through deposition of the data or interpretive reports with the Wiltshire and Swindon Historic Environment Record, as might reasonably be expected over such a timescale. As such, it has not been possible for the Applicant to review the underlying data that has supported the Durrington Walls discovery. The SHLP project did in 2018 provide to Highways England data and an interpretative report relating to a restricted study corridor, on a commercial basis and subject to an agreement not to distribute</p>

	<p>further: this report was fully considered by the Applicant in their preparation of the Environmental Statement.</p> <p>The evaluation methodology employed by Highways England was developed in consultation with and approved by Wiltshire Council and HMAG. Likewise, the conclusions of the ES and HIA were found to be acceptable by Wiltshire Council and Historic England [see for example, Historic England closing submission AS-111].</p> <p>The HIA and ES did consider similar features within the redline of the scheme, as described in the accompanying ES and HIA Addenda. The HIA and ES Addenda prepared by the Applicant assess the Durrington Walls discovery following the previously accepted methodology find that the conclusions of the previous assessments are not altered by the discovery.</p>
<p>2.a(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 breaching the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the 2017 Regulations).</p>	<p>The archaeological evaluation undertaken for the Scheme did identify and investigate the large pit-like features within the Scheme boundary that are cited by Mr Garwood, as well as similar features within the Scheme boundary. The Applicant considers that the interpretation of the features cited by Mr Garwood as of natural origin (but containing cultural material) is sound, based on the evidence from the evaluations [see REP1-045 & 046; REP1-042 & 043; REP1-049 & 050; REP1-051].</p> <p>As far as any additional or wider interpretation that might be entertained in light of the recently published discovery, see response to 2a(ii) above.</p> <p>In order to verify that the Durrington Walls discovery and its implications do not alter the conclusions of the ES, the Applicant</p>

	<p>has prepared an ES Addendum that assesses the impacts and Likely Significant Effects of the construction and operation of the Scheme on the new discovery, and on isolated large pit-like anomalies identified elsewhere in the WHS and within the DCO boundary in figure 9 of the SHLP paper.</p>
<p>(2b) the discovery renders the Detailed Archaeological Mitigation Strategy ('DAMS') profoundly out of date; and</p>	<p>The DAMS [TR10025-001951] provides a comprehensive strategy for the mitigation of impacts on archaeological remains. The DAMS provides for development of site specific research questions with input from specialists through SSWSIs; for natural features containing cultural material to be fully (100%) excavated; and for iterative development of strategies on site to respond to the nature and significance of the features encountered. The Applicant understands that Wiltshire Council and Historic England consider that the DAMS provides an adequate basis for development of site-specific research questions and SSWSIs.</p> <p>The Applicant considers that these DAMS provisions provide ample scope to address discoveries during the mitigation programme, and to take account of emerging discoveries and theories within the WHS. Where large pit-like features are encountered during the mitigation process, the DAMS provides at paragraph 6.3.42 for pits and other isolated features (including natural features that have been shown to contain archaeological remains) to be completely (100%) excavated. The DAMS is therefore fit for purpose.</p>
<p>(2c) 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</p>	<p>The Applicant has prepared an Addendum to the published HIA that specifically considers the discovery and its significance and the impact of the Scheme on it.</p>

<p>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.</p>	
<p>(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.</p>	<p>N/A</p>
<p>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:</p> <p>Article 4</p> <p>Each State Party to this Convention recognizes that the duty of ensuring the identification, <u>protection, conservation, presentation and transmission to future generations of the cultural and natural heritage</u> referred to in Articles 1 and 2 and situated on its territory, belongs primarily to that State. <u>It will do all it can to this end, to the utmost of its own resources</u> and, where appropriate, with any international assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain.</p>	<p>The Applicant has previously responded, in detail, on the Scheme's compliance with the World Heritage Convention (WHC), including with articles 4 and 5 of the WHC – please see, for example:</p> <ul style="list-style-type: none"> - the Applicant's response to ExA's Written Questions – General and Cross-topic G.1.1 [REP2-021] - the Applicant's Comments on Written Representations [REP3-013], particularly paragraphs 21.4.8–21.4.16 in response to the Council for British Archaeology and paragraphs 60.2.33–60.2.36 in response to the Blick Mead Project Team

<p>Article 5</p> <p>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:</p> <p>(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;</p> <p>(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;</p> <p>(c) <u>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;</u></p> <p>(d) <u>to take the appropriate legal, scientific, technical, administrative and financial measures necessary for the identification, protection, conservation, presentation and rehabilitation of this heritage;</u> and</p> <p>(e) to foster the establishment or development of national or regional centres for training in the protection, conservation and</p>	<p>- the Applicant's Comments on Any Further Information received at deadline 4 [REP5-003], particularly item 11.2.25 in response to the Stonehenge Alliance</p> <p>- the written summaries of oral submissions put at Cultural Heritage hearings on 5 and 6 June 2019, particularly in response to agenda items 3(i), 3(v), 3(vi) and appendix A [REP4-030]</p> <p>- finally, the written summaries of oral submissions put at Cultural Heritage hearings on 21 August 2019, particularly in response to agenda items 3.1(i) and 3.2(ii) [REP8-016].</p> <p>The Applicant does not consider that the findings of the 2020 SHLP paper (which are considered in the ES and HIA Addenda), or the submissions of the Blick Mead Project Team, Consortium of Archaeologists or the Stonehenge Alliance on 25 and 26 June 2020 raise any issues that bring into doubt or would cause a change to the Applicant's previous submissions on this point. The Scheme does not breach the WHC and is in full compliance with the UK's international legal obligations.</p>
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<p>presentation of the cultural and natural heritage and to encourage scientific research in this field. (Emphasis by Consortium of Archaeologists and Blick Mead Project Team)</p>	
<p>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.</p> <p>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.</p>	<p>The Applicant recognises the WHS as a single asset of the highest significance [see written summaries of oral submissions put at Cultural Heritage hearings on 5th and 6th June 2019, REP4-030, items 3 (ii) and (vi)]. The HIA and ES submitted with the Application assess the impact of the Scheme accordingly and assign the WHS the highest level of significance ('Very High' – applicable to the WHS and to features conveying attributes of OUV).</p> <p>With regard to the use of best available techniques, the evaluation strategy was developed in consultation with HMAG and the Scientific Committee and approved by Wiltshire Council and HMAG. SSWSIs were developed in consultation with HMAG and approved by Wiltshire Council and HMAG and the implementation of these on site was monitored by Wiltshire Council and HMAG.</p> <p>As to the best available data, see response to 2.a(ii) above.</p> <p>The archaeological field evaluation process set out in the AESR and OWSI combined non-intrusive geophysical surveys with ploughzone artefact sampling and trial trenching. This combination of non-intrusive and intrusive techniques is standard archaeological practice and accords with the Chartered Institute for Archaeologists (CIfA) Standard and Guidance for archaeological field evaluation (CIfA 2020). The evaluations successfully identified and examined solution features containing cultural material. Review of the evaluation results</p>

demonstrates a good correlation between the geophysics results and the trial trenching results across the Scheme.

The Applicant considers that the archaeological evaluation results, combining geophysical surveys with testing by trial excavation, form a robust baseline on which to make assessments of the impacts of the Scheme upon archaeological remains. The evaluation strategy was endorsed as comprehensive in oral submissions by Ms Pomeroy Kellinger, on behalf of Wiltshire Council [REP4-030, items 5(i) and (ii)]. Historic England's closing submission [AS-111] confirms, "We believe that the dDCO, OEMP and DAMS set out a process to ensure that heritage advice and considerations can play an appropriate and important role in the construction, operation and maintenance of the Scheme [...] we consider sufficient safeguards have been built in for the detailed design stage". All of the above means that it is clearly in compliance with the NPSNN.

The HIA conducted by the Applicant in support of the Scheme is comprehensive and was prepared in accordance with relevant guidance and good practice; furthermore, the Applicant has provided an Addendum to the HIA that specifically considers the discovery and its significance – see responses to 2.a(i) above and 6 below.

The DAMS [TR10025-001951] provides a comprehensive strategy for the mitigation of impacts on archaeological remains – see response to 2.b above. The thoroughness of both the HIA and the DAMS means that they are fit for purpose and comply

	<p>with the requirements of the NPS for an asset of the highest significance.</p> <p>The Applicant has previously responded, in detail, on the Scheme's compliance with the World Heritage Convention (WHC), including with articles 4 and 5 of the WHC – see response to item 4 above. The Applicant does not consider that the findings of the 2020 SHLP paper (as considered in the ES and HIA Addenda), or the submissions of the Blick Mead Project Team, Consortium of Archaeologists or the Stonehenge Alliance on 25 and 26 June 2020 raise any issues that bring into doubt or would cause a change to the Applicant's previous submissions on this point. The Scheme does not breach the WHC and is in full compliance with the UK's international legal obligations.</p> <p>In light of the conclusions presented in the HIA Addendum and ES Addendum, it is clear that the Scheme maintains conformity with the NPS. This is on the basis that the HIA Addendum concludes that the discovery does not change the assessment of Scheme impacts on the WHS as a whole set out in the Main HIA and the ES Addendum has not identified any new likely significant effects beyond those already identified in the Main ES.</p>
<p>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.</p>	<p>See response to 5. above – the Applicant recognises that the WHS as a single asset of the highest significance. The heritage assessments conducted by the Applicant in support of the Scheme are comprehensive and have been prepared in accordance with DMRB Volume 11, Section 2, Part 5 (HA205/08) and Volume 11, Section 3, Part 2 (HA208/07), ICOMOS Guidance on Heritage Impact Assessments in Cultural</p>

World Heritage Properties (2011), and Historic England Good Practice Advice Note GPA 3: The Setting of Heritage Assets (2017).

In order to verify that the Durrington Walls discovery and its implications do not alter the conclusions of the HIA, the Applicant has prepared an Addendum to the HIA that specifically considers the discovery and its significance, its contribution to the Attributes, Integrity and Authenticity of the WHS, and the impact of the Scheme on the Durrington Walls discovery and on the OUV of the WHS as a whole.

The assessment considers the interrelationships between the Durrington Walls discovery and other monuments and landscape expressing Attributes of OUV asserted in the SHLP 2020 paper: Stonehenge (AG22), Durrington Walls, Woodhenge and Associated Sites (AG33), Larkhill Causewayed Enclosure (AG39), the Greater Cursus (AG23), Coneybury Henge and Associated Monuments (AG29). The HIA Addendum also considers the Wilsford Shaft, a designated discrete asset conveying Attributes of OUV of WHS (UID 2016; NHLE 1010833) and isolated pits, pit groups, natural and geological features in the landscape.

The assessment also includes consideration of natural features with evidence for human use and the presence of cultural material dated to the Neolithic and Bronze Age; the interplay between geology, topography, the development of the prehistoric landscape and the distribution of monuments; and potential visual relationships and inter-visibility of these areas with each other.

	<p>The HIA Addendum finds that the conclusions of the previous assessments on impacts on the WHS as a whole are not altered by the discovery.</p>
<p>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.</p>	<p>The archaeological evaluation undertaken for the Scheme identified and investigated the large pit-like features within the Scheme boundary that are cited by Mr Garwood. The Applicant considers that the interpretation of these features as of natural origin (but containing cultural material) is sound, based on the evidence from the evaluations [REP1-045 & 046; REP1-042 & 043; REP1-049 & 050; REP1-051]. No evidence to the contrary has been submitted.</p> <p>The suggestion that some of the pit-like anomalies will be “destroyed” by the Scheme is simplistic; any such features within the Scheme footprint that are not being protected during works and/or preserved in situ will be subject to detailed, professional archaeological investigation, reporting and prompt public dissemination of factual and interpretative information. The investigation and recording strategy for such features, including provision for systematic palaeoenvironmental sampling and scientific dating, is set out in the DAMS [TR10025-001951] and will be expanded within the relevant SSWSIs to be prepared by the archaeological contractor in consultation with Wiltshire Council and Historic England and, for sites within the WHS, HMAG, and approved by Wiltshire Council (in consultation with Historic England).</p>
<p>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</p>	<p>The Applicant notes and agrees that the Scheme is subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 EIA Regulations).</p>

<p>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.'</p>	<p>The Environmental Statement, and the Scheme application as a whole, is a thorough and robust assessment of the Scheme and its likely impacts on the environment, including on cultural heritage and is fully compliant with the 2017 EIA Regulations - no concerns were raised on this point by the Examining Authority during the examination into the Scheme application.</p> <p>Following the publication of the SHLP paper 2020, and the letter from the Secretary of State dated 16 July 2020, to assist the Secretary of State, the Applicant has carried out further work to consider the findings of the SHLP paper 2020 and the two further submissions received by the Secretary of State from the Blick Mead Project Team, Consortium of Archaeologists and the Stonehenge Alliance on 25 and 26 June 2020. This work is contained, in particular, in the ES and HIA Addenda that accompany this document and identify, describe and assess any alterations to the likely significant effects of the Scheme on cultural heritage that were reported in the Environmental Statement as a result of these findings. It should be noted, the work carried out concludes there would be no change to the likely significant effects previously identified. The Applicant intends that the work carried out is subject to the consultation and notification procedures contained in Regulation 20 of the 2017 EIA Regulations.</p> <p>This further work undertaken therefore further demonstrates and confirms the compliance of the Scheme with the 2017 EIA Regulations and that it is a complete and thorough assessment, and contains all "information reasonably required for reaching a reasoned conclusion on the significant effects of the</p>
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	<p>development" in line with Regulation 14 of the 2017 EIA Regulations.</p>
<p>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.</p>	<p>See response to 2.a(iii) and 8 above. The Secretary of State has all the information required under the 2017 Regulations and the NPS to make the DCO.</p> <p>In order to verify that the Durrington Walls discovery and its implications do not alter the conclusions of the ES, the Applicant has prepared an Addendum to the ES that specifically considers the discovery and its significance and the impact of the Scheme on it. The Addendum does not identify any basis on which to change the existing conclusions of the ES on likely significant effects.</p>
<p>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:</p> <p>'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).'</p>	<p>The Durrington Walls discovery and similar features within the Scheme boundary have been robustly evaluated and assessed in the ES, HIA and ES and HIA Addenda. The Applicant submits that the DAMS [TR10025-001951] does take account of the large features that were identified in the archaeological evaluation, contra Mr Garwood's representation: references to the specific features cited by Mr Garwood and the approach to archaeological mitigation for them (as discussed above) are set out in DAMS Appendix D, Sites 19, 24 and 29. Where any further such features are encountered within the construction footprint, and will therefore be removed by the Scheme, the DAMS already provides for 100% excavation of pits, post-holes and other isolated features (including natural features that have been shown to contain archaeological remains).</p>

<p>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.</p>	<p>See responses to 2.c, 6, 8 and 9 above.</p> <p>In order to verify that the Durrington Walls discovery and its implications do not alter the conclusions of the HIA, the Applicant has prepared an Addendum to the published HIA that provides an objective assessment of the significance of the discovery – taking into account for this purpose the interpretations put forward by the authors of the SHLP paper – and the impact of the Scheme on it.</p>
<p>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.</p>	<p>See responses to points 8 and 9 above.</p>
<p>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</p>	<p>The Applicant does not agree with these comments and considers that the representation has failed to explain, at all, why any procedural unfairness could be suffered.</p> <p>The Applicant notes that the Secretary of State's letter of 16 July 2020 has set out a full process for allowing the recipients to respond to the SHLP paper 2020 and to the submissions of the Blick Mead Project Team and Consortium of Archaeologists or the Stonehenge Alliance on 25 and 26 June 2020, as well as to allow the Blick Mead Project Team and Consortium of Archaeologists and/or the Stonehenge Alliance (and other interested parties) to submit further submissions by the same</p>

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.

deadline of 13 August 2020. Thereafter, the parties will have a further period in which to comment on the submissions. In addition, as set out above, it is intended that the work undertaken by the Applicant is subject to notification and consultation procedures mirroring Regulation 20 of the 2017 EIA Regulations.

As such, all interested parties will have a full opportunity to be consulted and submit representations/evidence as they consider appropriate on the issues at hand. The Secretary of State will then need to take these submissions into account when determining the application. There is therefore no basis for any assertions of procedural unfairness.

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