

Our ref: SoS-03  
Your ref: -

The Secretary of State  
c/o Natasha Kopala  
Department for Transport  
Great Minster House  
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13 August 2020

Dear Sir/ Madam,

**Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010  
Application by Highways England for an Order granting Development Consent for the  
construction of a new two-lane dual carriage way for the A303 between Amesbury and  
Berwick Down in Wiltshire**

**Response to request for comments and further information in relation to the recent  
archaeological discovery by the Hidden Landscapes Project**

Further to your letter dated 16 July 2020 requesting comments on matters raised in the Hidden Landscapes Project report and representations relating to the archaeological find at the World Heritage Site, please find below and attached Highways England's ("the Applicant's") response. In addition to this letter, the following documents are enclosed:

- Environmental Statement – Addendum addressing 'new discovery' responding to Secretary of State letter dated 16 July 2020
- Heritage Impact Assessment – Addendum addressing 'new discovery' responding to Secretary of State letter dated 16 July 2020
- Highways England overarching response addressing 'new discovery' responding to Secretary of State letter dated 16 July 2020

The response by Highways England to the two points as presented in the Secretary of State's letter dated 16 July 2020 is as follows:

***Implications of the archaeological find for the Development and any harm it may cause to the World Heritage (Site)***

**Highway England's response:**

The documentation provided has been prepared by the Applicant to consider the implications of the archaeological discovery for the Scheme. The Overarching Response document draws together the conclusions from the other documents prepared, namely the Heritage Impact Assessment (HIA) Addendum and Environmental Statement (ES) Addendum. Section 6 of the Overarching Response document states the following.

*"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.”*

### ***Implications for the Applicant’s Environmental Statement, including the Heritage Impact Assessment, and the proposed Detailed Archaeological Mitigation Strategy***

#### **Highway England’s response:**

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.

#### ***Heritage Impact Assessment***

The HIA Addendum addresses the new discovery and has been prepared to complement the existing HIA. Section 3.4 of the Overarching Response document states the following.

*“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.*

*Large pit-like anomalies within the Scheme boundary identified via geophysical survey and evaluation are already assessed in the Main ES and Main HIA submitted with the Application 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.*

*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.*

*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.”*

#### ***Environmental Statement***

The ES Addendum has been prepared to complement the ES submitted with the Application for the purpose of considering the impacts and any likely significant effects of the construction and operation of the Scheme on the Durrington Walls discovery, on heritage assets particularly related to the discovery, and on large pit-like anomalies identified within the Scheme boundary. Section 4.4 of the Overarching Response document states the following.

*“The ES Addendum has not identified any new likely significant effects beyond those already identified in the ES submitted with the Application.*

*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 construction of the eastern portal.*

*There would be no additional adverse effect on the settings of the Durrington walls discovery due to operation of the Scheme.”*

Section 4.4 of the Overarching Response also reports no new likely significant effects on the large pit-like anomalies suggested in the Hidden Landscapes Project report and the representations.

### **Detailed Archaeological Mitigation Strategy**

The Overarching Response document also demonstrates that the DAMS is fit for purpose. Section 5.5 of the Overarching Response document sets out the following.

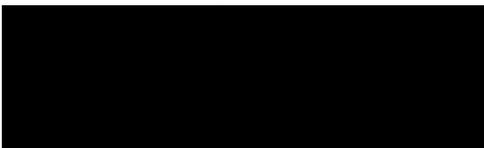
*“The DAMS provides a comprehensive strategy for the mitigation of impacts on archaeological remains, and is fit for purpose both as the basis for development of Heritage Management Plans and Method Statements, which together provide the mechanism by which site works that could affect the historic environment 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.*

*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.”*

The Applicant proposes to consult on the enclosed documents using the procedure set out in Regulation 20 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended by the Infrastructure Planning (Publication and Notification of Applications etc.) (Coronavirus) (Amendment) Regulations 2020). Further details of these proposals will follow shortly.

Please do not hesitate to contact me in the event there are any further queries or clarifications on our response.

Yours faithfully,



Derek Parody  
A303 Stonehenge Project Director

Encs: