

The Rt Hon Grant Shapps, MP
Secretary of State for Transport

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Dear Secretary of State

A303 STONEHENGE: RESPONSE BY ICOMOS-UK TO A REQUEST FOR COMMENTS AND FURTHER INFORMATION ON THE HIDDEN LANDSCAPES PROJECT REPORT

1. Context

ICOMOS-UK welcomes the opportunity provided by the extended Appeal date for further consultation on the potential impacts of the proposed A303 road scheme on cultural heritage assets in the light of recent crucial archaeological discoveries within the landscape of the Stonehenge World Heritage site (WHS) arising from the Hidden Landscapes Project.

- 1.1 At the time of the first Public Inquiry in 2004, archaeologists were in the early stages of non-invasive surveys of the World Heritage landscape and these were already revealing previously hidden features that added to our understanding of the scope and intensity of pre-historic use, a fact acknowledged in the retrospective Statement of Outstanding Universal Value (SoOUV) approved by the World Heritage Committee in 2013. Since then, significant steps have been undertaken through landscape scale non-invasive surveys and targeted intensive local excavations to extend further understanding of the visual and ceremonial inter-relationships between monuments and sites.
- 1.2 The most recent discovery by the Hidden Landscape Project of the large planned Durrington pit circle, at around one mile in diameter, is Neolithic landscaping on a massive scale and has confirmed in a most spectacular way how the key features within the defined WHS are precise and deliberate and reflect more complex prehistoric societies than had previously been envisaged.

- 1.3 The wider Stonehenge landscape is merging as perhaps the best exemplification globally of the way prehistoric peoples used, marked and visually connected ceremonial spaces on a massive scale over a period of at least three millennia.
- 1.4 The Durrington pit circle discovery greatly strengthens our knowledge of the landscape between the Avenue, the eastern end of the Cursus and Durrington Walls henge. The data uncovered is said by one of the archaeologists involved to '*hint at evidence for the maintenance of this monumental structure into the Middle Bronze Age which, if correct, would have significant implications for our understanding of the history and development of monumental structures across the Stonehenge landscape*'¹.
- 1.5 The recent discoveries also reinforce strongly the idea that the overall prehistoric ceremonial landscape had two visually interconnected foci: the main henge in the west and Durrington Walls henge in the east (until it was later replaced by a new western settlement), representing sacred and domestic, or ancestors and the living, and possibly also with the Avenue between.
- 1.6 The Durrington pit circle discovery could perhaps extend the notion of landscape markers to the Avenue as some of the pit site locations appear to frame the Eastern horizon along the first segment of the Avenue from the River to Back Barrow Ridge, which has a similar date to the Durrington pits and which is inter-visible with Durrington Walls and Stonehenge.
- 1.7 While it cannot be said that there is full understanding of the meaning of recent discoveries at Durrington, or of precisely how they might inter-relate to other monuments and sites in the landscape beyond visual links, what can be said is that as new attributes of OUV they add significantly to our understanding of the scale and scope of Neolithic/Chalcolithic landscape undertakings, and the importance of spaces between sites where there might be an absence of monuments and only scattered small finds.
- 1.8 Although the Durrington discoveries have made the headlines, these are only part of a wider network of Neolithic pit sites identified over the past decade across the WHS. These point up the need for further studies to demonstrate just how far the planned Neolithic/Chalcolithic landscape extended to the west.
- 1.9 The Outstanding Universal Value of the WHS relates to the '*exceptional survival of prehistoric monuments and sites*' that '*together with their settings form a landscape without parallel*' in which the '*careful siting of monuments in relation to the landscape helps us understand the Neolithic and Bronze Age*' and the way a '*wealthy and highly organised prehistoric society [was] able to impact its concepts on the environment*'. But it also acknowledges under justification for Criterion (ii) that the WHS provides '*an excellent opportunity for further research*' and under Authenticity that '*the materials and substance of the archaeology make the property an extremely important resource for archaeological research, which continues to uncover new evidence and expand our understanding of pre-history*'.
- 1.10 Knowledge and understanding of the meaning of the Stonehenge landscape has improved exponentially over the past two decades with the use of new non-invasive surveys combined with targeted excavations. And it must be accepted that the landscape could well reveal much

¹ 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>

more in the future with the use of further as yet undiscovered tools. The idea of the landscape as a resource that holds the potential to provide new evidence and further expand our understanding of prehistory must be respected.

- 1.11 It should also be noted that the newly discovered pit circle extends beyond the WHS boundaries and this reinforces an understanding of how attributes of OUV spill out into the surrounding landscape, which in turn brings an urgent need to define and protect the immediate setting of the WHS.

2. The implications of the recently published findings of the Hidden Landscape Project in relation to harm to the World Heritage site:

- 2.1 Although the precise meaning of the Durrington pit circle and its associated alignments remain to be more fully understood on the basis of further research, they nevertheless can be said to be important new attributes of OUV, which reflect a completely new scale of Neolithic landscape planning that implies the existence of larger and more complex societies than had been previously envisaged, and reinforce strongly the idea of two centres in the landscape, one the main henge and the second Durrington Walls henge, linked in some way perhaps through the Avenue and the inter-visibility of large and smaller monuments.
- 2.2 The Durrington finds also underline the necessity to clearly understand how small individual sites link to form larger spatial landscape formations and encompass areas which may have no monuments or sites and only scattered finds. This clearly reinforces the idea that lack of evidence of monuments and sites in certain parts of the property cannot be said to suggest that nothing of value exists at a landscape scale. There now should be no doubt that the WHS cannot be seen as a collection of prehistoric monuments and sites interspersed by blank spaces into which development could be allowed.
- 2.3 Overall, the Durrington discoveries have highlighted the exceptional sensitivities of the Stonehenge landscape, the massive scale of its prehistoric landscape concepts, and the urgent need for more research to allow a fuller understanding of their scope and embedded meaning. They also draw attention to the recognition in the SoOUV that knowledge and understanding of the landscape has improved since the time of inscription, and furthermore, and most crucially, that the landscape needs to be treated as an important resource for future archaeological research with its potential to uncover new evidence that could expand even further our understanding of pre-historic societies.
- 2.4 Under the current road proposals, the Eastern Portal and its associated road infrastructure would destroy any possibility of further long term research or of large scale discoveries between the Avenue and Durrington. The structures would also install a permanent and irreversible divide between important facets of the prehistoric landscape, Durrington pit circle and the Avenue, which could be closely linked in terms of their use and significance.
- 2.5 The construction of the proposed western portal and its associated cutting raises similar issues. Here we know that this would lead to the destruction of significant parts of large scale, pre-historic landscape concept. When the Durrington Walls settlement ceased to be used, a new settlement was developed in the west extending from the western edge of the Greater Cursus south towards the A303. The proposed cutting would destroy many dozens of burials of this later second domestic focus, which should be viewed as of equal importance to the earlier one,

as it had a similar complementary status with the main henge, reflecting the domain of the living as opposed to the domain of the ancestors.

2.6. Both of these interventions have been justified on the basis that no finds of significance have been found in the areas of the proposed cutting, portals or associated roads in the east. But as the Durrington pit circle has shown, prehistoric landscape planning cannot be identified on the basis of small scale surveys, as areas with only small-scale scattered finds, but no monuments or substantial sites, can be part of larger-scale planned designs.

2.6 All of this reinforces the assertion made throughout the Public Hearings by many parties that there can be no justification for destroying swathes of the Stonehenge landscape on the basis that nothing has been found, or nothing of major importance, when the OUV of the property relate to large-scale Neolithic/Chalcolithic landscape planning, now revealed to be on a scale not known elsewhere in Britain or in any other site so far inscribed on the World Heritage list, and is predicated on the idea that the overall landscape must be kept as a resource to allow research and surveys to reveal over time the evidence it holds.

2.7 The new finds have thus strengthened the meaning of a ‘landscape without parallel’ to embrace integrated prehistoric planning at a scale found nowhere else within the World Heritage list, and which could be even more extensive than is currently known.

3. The implications of the recently published findings of the Hidden Landscape Project Impact in relation to the Environmental Statement, including the Heritage Impact Assessment, and the proposed Mitigation Strategy

3.1 In our earlier contributions, the inadequacies of the Heritage Impact Assessment (HIA) were clearly set out in relation to the impact of the proposals on the integrity of the overall WHS as well as the integrity of individual sites and clusters of sites. What was not properly considered was impact on landscape links and landscape planning: rather the HIA concentrated on assessing impact on individual ‘assets’ or ‘asset groups’ as they were called.

3.2 Although ‘*The disposition, physical remains and settings of the key Neolithic and Bronze Age funerary, ceremonial and other monuments and sites of the period, which together form a landscape without parallel*’² was seen as an attribute, the analysis of impact focused on how the Scheme would ‘*improve the setting of numerous assets within the WHS*’³, ‘*avoid major known concentrations of archaeological remains that contribute to the OUV of the WHS*’⁴ and although ‘*it would have adverse effects on the setting of some assets and Asset Groups*’⁵, the beneficial effects were considered ‘*to slightly outweigh the adverse effects of the Scheme in terms of this Attribute*’⁶. Nowhere was the impact on the overall form or spatial arrangement of the landscape considered.

3.3 The HIA also outlined impact on the integrity of physical relationships between the monuments such as between the Normanton Down Barrows, the Winterbourne Stoke

² Appendix 6.1 Heritage Impact Assessment by Highways England, page 6, attribute 6.

³ Op.cit page 27, Attribute 6

⁴ Op.cit, page 28, Attribute 6

⁵ Op.cit, page 28, Attribute 6

⁶ Op.cit, page 28, Attribute 6

Crossroads Barrows and the Diamond Group, as well as visual and physical relationships between long barrows in the western part of the WHS and other dispersed barrows and associated monuments (and further examples) and yet concluded that impact on integrity overall was *'Negligible Positive impact on the Integrity of the WHS, resulting in a Slight Beneficial effect'*.⁷

- 3.4 The assessment included no clear acknowledgment of the way these visual and other spatial links between monuments and sites was part of a much larger scale spatial planning and thus did not suggest what impact cutting into these connections might have.
- 3.5 A further gap in the HIA is the lack of any assessment of impact on the potential of the landscape to reveal more evidence.
- 3.6 These weaknesses have become all the more apparent in the light of the Durrington pit circle finds. These new attributes clearly demonstrate the scale of formal, spatial, landscaping that was undertaken in the Neolithic period, with long distance links across a circle of around a mile in diameter reinforced by visual links between Durrington Walls henge and the main henge that are even further apart.
- 3.7 The new finds clearly demonstrate the high potential for the landscape to reveal significant new facets of prehistoric spatial landscape planning, both now on the basis of the tools we have, and in the future on the basis of further new techniques, and this potential, which is a key aspect of OUV, must be respected.
- 3.8 Overall, ICOMOS-UK considers that the new finds reinforce the idea that decisions taken on the basis of limited assessments would harm OUV in terms of damaging links between monuments, sites and areas that could have the potential to deliver in the future profound insights into complex prehistoric planning and the structure of societies,
- 3.9 In terms of specifics, the location of the eastern portal and its associated road works could compromise links between the Durrington pit circle and the lower segment of the Avenue, which, although only surmised at this point in time, need to be the subject of further detailed investigations to better understand the relationship between the Avenue and Durrington Walls henge, as well as between the main henge and Durrington Walls henge, as two key focal points of the prehistoric landscape. The proposed eastern intervention can now be seen to have the potential to cause considerable, irreversible harm to the integrity of the globally important Neolithic spatial planning that is beginning to be revealed.
- 3.10 The massive scale of the new discoveries demonstrates the ineffectiveness of the limited sampling techniques undertaken and proposed for the locations of portals, cuttings and roadworks, which are more suitable to small finds rather than the scale of prehistoric landscape designs such as those just revealed.
- 3.11 The sampling techniques cannot exclude the possibility that parts of major landscaping concepts exist in the areas proposed for development. While the sampling may be able to reveal that there are no barrows or Neolithic pits directly in the impacted areas, (although it has been acknowledged that the western cutting will impact on some burials– although not the dozens

⁷ Op.cit, page 30

estimated by archaeologists), it has not indicated whether and how such sites form part of important spatial patterns or visual links.

- 3.12 It is becoming increasingly clear from the recent Durrington finds that while we may be able to map individual sites at a micro scale, we only beginning to recognise macro scale relationships, such as those revealed by the Hidden Landscapes project. Further surveys, targeted excavations and analysis using all the tools that are now available could greatly increase our understanding of macro forms in the landscape which shifted and changed over time, and, as new tools become available, even more knowledge might be revealed in the future.
- 3.13 Given this, it is clear that the outcomes of the HIA, which was based on limited knowledge as well as limited application of that knowledge, cannot be said to provide a sound judgment to support the idea that certain areas of the WHS have no attributes that contribute to OUV, and that destroying such areas would not compromise the integrity of the WHS, or that the obligation to protect the landscape as a resource for future generations has somehow been fulfilled by the limited surveys so far undertaken – and which have not even been released into the public domain.

4 Conclusion

- 4.1 In conclusion, ICOMOS-UK considers that these new discoveries reinforce strongly the view that the Stonehenge WHS as a 'landscape without parallel' must be protected as an entity for the outstanding importance of what it has revealed so far of ceremonial constructions and large-scale prehistoric spatial planning and for what it has the potential to reveal in the future – a potential so vividly demonstrated by the recent Durrington pit circle finds.

We would be more than ready to provide any clarification that might be needed on these points.

Yours sincerely

Susan Denyer
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