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**Subject:** A303 Stonehenge  
**Date:** 28 September 2020 20:45:57  
**Attachments:** [Stonehenge Alliance comments on responses to 2nd SoS consultation 28.9.20.pdf](#)

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Dear Sir or Madam,

I attach the comments of the Stonehenge Alliance on responses to the Secretary of State for Transport's 2<sup>nd</sup> Consultation. I would be grateful if you should, please, send me acknowledgement of receipt.

Yours faithfully,

Kate Fielden  
Hon Sec to the Stonehenge Alliance

## THE STONEHENGE ALLIANCE

Chairman, George McDonic, MBE, BL, DIPLTP, FRTPI, DPA, FFB

From the Hon. Secretary, Dr Kate Fielden

The Rt. Hon. Grant Shapps, MP  
Secretary of State for Transport  
C/O Ms Natasha Kopala  
Head of Transport Infrastructure Planning Unit  
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London SW1P 4DR

Sent by email on 28 September 2020 to:  
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and [TRANSPORTINFRASTRUCTURE@dft.gov.uk](mailto:TRANSPORTINFRASTRUCTURE@dft.gov.uk)

Dear Secretary of State,

### **A303 Stonehenge. Examination reference number (Stonehenge Alliance): 2001870**

In reply to a request on your behalf, of 20 August 2020 (DfT 2020b), the Stonehenge Alliance is pleased to comment on the responses of the Applicant and other consultees to your earlier request concerning the new 'Durrington pits' archaeological find (i.e., your 2<sup>nd</sup> Consultation). In a separate annex our transport specialist Dr Simon Temple answers Wiltshire Council's comments on our 2<sup>nd</sup> Consultation responses concerning transport and climate change.

#### **1. Introduction**

1.1. The subject matter of your 2<sup>nd</sup> Consultation is set out in the letter on your behalf to Interested Parties of 16 July 2020 (DfT 2020a):

*"In light of the archaeological find, the Secretary of State would welcome the views of the Applicant, Historic England, Wiltshire Council and other recipients 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."*

1.2. We are largely in agreement with the responses to the above of objectors to the Scheme and therefore comment principally on the responses of the Applicant and Scheme supporters.

We note the undoubted expertise of those archaeologists who make up the Consortium of Archaeologists and Blick Mead Project Team, together with the CBA and ICOMOS, all of whom object to the Scheme. We are concerned that the documentation produced by the Applicant does not reveal who it is written by or give any of their credentials. We consider that considerable weight should be given to the expertise of the aforementioned objectors

particularly as their views on the Scheme align with the undoubted authority of the World Heritage Committee.

1.3. The new archaeological find is of major importance and serves as a timely reminder of what could be lost to the Development in knowledge about our past, irreversible damage to an acclaimed archaeological landscape, and international confidence in UK treaty obligations.

The response to the find by the Applicant and supporters of the Scheme is unconvincing. In general, their responses (together with the ES) fail to appreciate the fundamental importance of the WHS as a whole – which is a landscape of interconnected assets rather than simply a collection of individual assets. We address this further below.

1.4. We believe response to the first question requires a deeper analysis, involving an opposite approach to that taken by the Applicant and Scheme supporters English Heritage, the National Trust, Wiltshire Council and the World Heritage Site Coordination Unit (WHSCU) who have addressed both issues on which views are sought. We understand the Secretary of State first to have asked for views on the implications for the Development of the new find and any harm the Development may cause the WHS; and secondly, whether the new find has implications for the Applicant's relevant ES documentation. This was the approach taken by us and by key objectors to the Scheme who responded to your 2<sup>nd</sup> Consultation (DfT 2020a): the Consortium of Archaeologists and Blick Mead Project Team, ICOMOS-UK, WANHS and the CBA. It is also the approach taken by Government adviser Historic England.

1.5. We have assumed that by “World Heritage” is meant the Stonehenge part of the Stonehenge, Avebury and Associated Sites WHS, since this is the only designated world heritage here under consideration. There remains confusion among Scheme supporters about the concept of OUV and what must be protected under the terms of the WH Convention. It should be borne in mind that “attributes of OUV” are not “World Heritage” nor are they individually of OUV but only when wholly in combination, i.e., comprising a WHS (UNESCO 2019, paras. 77 and 88; Simmonds & Thomas 2015, p.32, para. 2.3.8). The WH Convention defines *delineated WH properties* as being of OUV (UNESCO 1972, Preamble and Articles 1–3); while Articles 4 and 5 commit signatories to protection, conservation, transmission to future generations and, in so far as possible, rehabilitation of their WH Sites. In the case of Stonehenge, this includes the whole delineated landscape.

1.6. We note reference of the Applicant and Scheme supporters to the support of the Scientific Committee, the independence of which is in question.

## **2. The Applicant's response**

2.1. The Applicant, in its HIA Addendum, takes the new find (Gaffney *et al.*, 2020) at face value bearing in mind – as do most interested parties – that the findings are at a preliminary stage and further work will be needed to understand their full meaning and significance (Highways England 2020a, para. 2.3.1, last bullet point, and 2.3.2).

2.2. The Applicant's approach throughout the DCO application process gave greater emphasis, in terms of assessed adverse impacts, to the effects of the Scheme on

archaeology, historic assets, and attributes of OUV encountered on or close to the line of the proposed A303 works.

The same approach is taken in the Applicant's ES Addendum in respect of the new archaeological find (Highways England 2020b: p.6, para. 1.1.10). The *effects of the Scheme on the new find* are assessed in terms of its physical impacts, visibility and distance from the Durrington pits. It is therefore not surprising that the applicant finds no direct physical impacts of the Scheme on the new find and potential features associated with it and no adverse effects on its setting. Changes to the ES, including the HIA, in the form of addenda are made to incorporate these findings which lead to no change in the assessment of Scheme impacts in the HIA, and no changes proposed to the DAMS (*ibid.*, p.32, para. 7.4.1; Highways England 2020c; 2020d: "Executive summary").

2.3. The Applicant does not take the opportunity offered by the 2<sup>nd</sup> Consultation to change its approach to assessing the impacts of the Scheme on the WHS, its attributes of OUV, Integrity and Authenticity (Highways England 2020d: paras.1.2.3–4 and 3.1.2). The Stonehenge Alliance and other objectors argued at the Examination, and subsequently, that the Applicant's ES is deficient in not properly considering the impacts of the Scheme on the WHS property as a whole and its setting, as advised by ICOMOS (Stonehenge Alliance 2020a, para. 2.1.2. and references therein to Stonehenge Alliance e.g., [REP2-136](#), sections 1.3.2–1.3.8; and ICOMOS-UK, [REP6-054](#), LV2.1, "Integrity of landscape and cultural heritage").

2.4. The Applicant continues to assert that "*The Scheme does not breach the WHC and is in full compliance with the UK's international legal obligations . . . it is clear that the Scheme conforms with the NPSNN*" (Highways England 2020d: "Executive summary"). This is obviously not the case as we and others have stated in previous representations (e.g., Stonehenge Alliance, [REP2-134](#), Sections 3.8 and 3.15; see also our para. 1.5, above). The NPSNN para. 1.2 requires decisions to be made in accordance with international treaty obligations.

2.5. Highways England refers to the involvement of the Scientific Committee in agreeing an evaluation strategy, presumably intending thereby to lend credibility to its strategy. As HMAG members are also members of the Scientific Committee, the latter does not "supplement" or provide entirely independent advice as is inferred (Highways England 2020d: para. 2.2.1). The Alliance has earlier commented on the Scientific Committee's lack of independence from key Scheme supporters and the Applicant (Stonehenge Alliance 2020b, pp.3–4: "Comments concerning the Scientific Committee").

### **3. The responses of other key Scheme supporters**

#### **3.1 English Heritage**

3.1.1. English Heritage has taken a similar stance to that of Highways England in seeing the implications of the new find as being no more than the discovery of a heritage asset not yet fully understood but one to be included within the standard assessments of Scheme impacts undertaken by the Applicant. These assessments and associated ES documents are considered adequate to deal with this and any other new discoveries on the Scheme; while

the DAMS highlights that “*research questions must always be at the forefront of the minds of the developer*” (English Heritage 2020, “Conclusion 3” and “Implications for the . . . DAMS”).

3.1.2. The Scientific Committee, whose independence from Scheme supporters, including English Heritage, is in doubt (see our comments under 2.5, above), is referred to as advising on research questions and any improvements required to the mitigation strategy.

3.1.3. English Heritage also appears confused about the concept of OUV and what needs to be protected (*ibid.*, Introduction). The suggestion that the scheme could greatly enhance the OUV of the WHS does not accord with the view of the World Heritage Committee; the surface road would not be entirely removed and the Scheme would severely damage the WHS in direct conflict with the UK’s World Heritage Convention obligations. (See also our para. 1.5, above.)

### **3.2. The National Trust**

3.2.1. The Trust challenges the authenticity of the new find but admits that “*the identification of the features referred to by the HLP undoubtedly substantially adds to our understanding of the Stonehenge landscape*” (National Trust 2020, p.5, para. 4.1.1); but were the Stonehenge Hidden Landscapes Project (SHLP) discovery found to be an attribute of OUV, the development would not result in “*having any additional adverse impacts on the OUV, Integrity or Authenticity of the WHS*” (*ibid.*, pp.1–2 of covering letter).

3.2.2. Like the Applicant, the Trust remains confused about policy regarding the WHS (*ibid.*, paras. 2.1.2–3) and the damaging impacts of the Scheme on the WHS in the face of the WH Committee’s advice (*ibid.*, para. 7.1.4). Please see our comments on the WH Convention under paras. 1.5 and 2.4, above. UNESCO’s *Operational Guidelines*, UK policy and the WH Convention demand protection of the WHS *property* which is of OUV. It is by protecting the WHS and its attributes of OUV that its OUV may be sustained and/or protected.

3.2.3. Again, like the Applicant, the Trust has not strictly addressed the first of the issues on which views were requested. Rather, it has considered the direct impacts of the development on the new discovery, finding there to be none (*ibid.*, paras. 5.1.1–2; 7.1.2). Indirect impacts are not mentioned.

3.2.4. The “*Scientific Committee (an independent panel of experts)*” is referred to (*ibid.*, para. 6.1.2) but, as we have already pointed out, the Committee is not independent.

3.2.5. The Trust finds no substantive change to the impacts of the Development on the World Heritage property arising from the find (*ibid.*, para. 6.1.1). This accords with the approach to HIA taken by the Applicant and other Scheme supporters mentioned at our para. 1.4., above, in which the impacts of the Scheme are assessed not on the WHS as a single heritage asset – a landscape of interrelated monuments and sites – but in terms of its effects on individual or groups of monuments and sites. It is therefore not surprising that the Trust apparently considers that the ES, DAMS and HIA require no substantive changes (*ibid.*, Section 6 and para. 7.1.3).

### **3.3. Wiltshire Council**

3.3.1. Like the National Trust, Wiltshire Council challenges the authenticity of the new find; its case is similarly unconvincing in view of the obvious validity of the SHLP's report and the peculiar configuration of the massive Durrington pits – unique in the WHS – and the lack of sufficiently detailed knowledge about them (Wiltshire Council 2020, pp. 2–3, Sections 2.1–2.2).

3.3.2. Like the Applicant, the Council mentions that the Scheme will not impact directly on the find which is some distance from it (*ibid.*, Section 2.3).

3.3.3. The evaluation and the mitigation proposed for the Scheme is considered by the Council to be of a high standard and supported by the Scientific Committee which is also cited as helping with survey and trenching strategies and developing research questions in the DAMS to allow the new finds to be taken into account (*ibid.*, Sections 2.3, 2.4 and 2.5). (Please see our para. 2.5, above, re the Scientific Committee.)

3.3.4. It is suggested of the find that

*“Excavation by means of large machine dug sections and appropriate sampling, as has been carried out on other sites in the vicinity by Wessex Archaeology, will be the most likely method of providing the answers sought from these large enigmatic features. Dating is crucial to understanding what they are, how they formed and when. This type of large-scale excavation is the best way to maximise the chances in acquiring the suitable dating material needed to answer these questions.”* (*Ibid.*, Section 2.4, Query 2).

Machine excavation is not ideal for recovering prehistoric evidence. The Council's suggested approach would be used only if other options were not considered practicable, as in development-led archaeological work. Such work north and northeast of the WHS (in which none of the large pits potentially associated with the Durrington pit circle was fully excavated to its base) has given rise within a short time to important retrospective questions, notably in the light of the new SHLP find which was not known about at the time.

3.3.5. The Council recognizes the considerable timescales and work involved in obtaining and dealing effectively with archaeological data:

*“Understanding and interpreting the massive datasets recovered by high resolution geophysical surveys is a hugely challenging and difficult task. Hence it has taken over 10 years for some of the results of the SHLP project to be interpreted and presented. In order to make any sense of the data and to be able to pick out features formed by deliberate patterned human behaviour, a comprehensive programme of systemic excavation and sampling is required.”* (*Ibid.*, Section 2.2: “Difficulties with the Evidence Presented”.)

Such extensive exercises are clearly beyond the capabilities of proposed archaeological work on the Development, but this seems to have been overlooked.

3.3.6. It appears that Wiltshire Council sees few, if any, implications for the Development in the new find, though there is a need to ensure that similar features are not missed on the Scheme (*ibid.*, Section 2.5: Conclusion). No implications are cited for any harm the Development may cause to the WHS; and, like other Scheme supporters, the Council

considers the find(s) “do not change the assessment of impact of the A303 scheme on the OUV of the WHS contained within the EIA and HIA.” (*Ibid.*, Section 2.4)

### **3.4. The Stonehenge and Avebury World Heritage Site Coordination Unit (WHSCU)**

3.4.1. The response from the WHSCU has summary resemblance to that of Wiltshire Council and is confused in its broad agreement with the rather differing views of Wiltshire Council and Historic England. It appears to be written by Wiltshire Council’s Heritage Services Manager *on behalf of* the WHSCU, rather than by the Unit’s independent WHS Co-ordination Officer whose views would be expected to be related more towards implementation of the WHS Management Plan, in which the primary aim of its overarching strategy, among other sustainable aims and policies, is “to protect the Site to sustain its OUV as agreed by UNESCO” (Simmonds & Thomas 2015, p.10), which the Scheme would obviously fail to do.

It is to be noted that the independent officer of the WHSCU clearly objected to the proposal at the Examination. Given that the submissions made there by WHSCU have not been amended/withdrawn, this response (written by Wiltshire Council’s Heritage Services Manager) is to be treated warily and cannot be considered the independent view of WHSCU.

### **3.5. Historic England**

3.5.1. Historic England, unlike the Applicant and other Scheme supporters, dealt correctly with the specific issues on which views were sought; it considered the implications of the find for the Development, rather than vice versa, and attempted to reconcile them with the Scheme and the relevant ES documents.

The implications of the SHLP’s work are summarized as follows:

*“The World Heritage Site at Stonehenge is one of the most important prehistoric landscapes in the world. Research such as this reminds us of the ability to revise our narratives by being open to new interpretations about how the landscape was used and experienced by Neolithic and Bronze Age communities. The process of reinterpretation of previous work and data and continued academic discourse is essential given the subjectivity of the process of archaeological interpretation. The work of the Stonehenge Hidden Landscapes Project team has posed a series of questions which when explored may provide new insight into a part of this story. Critical to our understanding of the spatial relationships between features within the Stonehenge WHS and its landscape will be the development of research frameworks and questions which include emerging themes of research.”* (Historic England 2020, para. 2.2.15)

It is noted that these questions “when explored may provide new insight with potential to influence the further development of the Scheme archaeological research framework” (*ibid.*, p.1, Summary of position).

3.5.2. The latter statement fails to acknowledge that it will take far more time to explore the questions posed by the SHLP than is available properly to benefit the Scheme’s archaeological research framework. Section 2.2 of Historic England’s response, “Observations on Matters Raised in the Stonehenge Hidden Landscapes Project Research”, implicitly accepts this fact. The Scheme, if it goes ahead, will be limited in time and resources, which has important implications concerning data obtained within the Scheme’s limits: current and future research projects are not so heavily constrained in this way.

3.5.3. Historic England explains that an integrated approach to landscape scale research investigations (*ibid.*, para.2.2.1; 2.2.14), a substantial database (*ibid.*, para.2.2.7), large-scale excavation (*ibid.*, para. 2.2.9) and a detailed scientific dating strategy associated with clearly defined research questions (*ibid.*, para.2.2.12–14) will be needed to fully understand the relationship between natural features in the landscape and human activity (*ibid.*, para. 2.2.3). These requirements are all clearly well beyond the capabilities of the Scheme in terms of time, cost and other practicalities.

3.5.4. In attempting to reconcile these extensive research aims and demands with revisions to relevant DCO application documentation, Historic England makes no attempt to address the damage the Development may cause to the WHS. Indeed, in the light of what it has already raised, the case it makes for the Development and accompanying relevant DCO documentation in respect of archaeology is both illogical and unconvincing.

3.5.5. There appears, however, some hesitancy fully to endorse the applicant's HIA with which Historic England "**broadly concurred**" and which it considers "**broadly consistent with our understanding of how the ICOMOS 2011 Guidance . . . should be applied**" (*ibid.*, para.2.4.7). Furthermore, in its "*review of the final iterations of key documents forming part of the DCO [we] confirmed that the concerns we had raised had **broadly been addressed***" (*ibid.*, paras. 2.4.8 and 4.2). (Our emphases in bold.)

3.5.6. At the same time, suggestions that technical workshops "*will be able to **take account of emerging research themes***" (*ibid.*, paras. 2.4.13) and that such workshops and consultations "*will be **able to influence the development of the mitigation strategy under the Scheme***" (*ibid.*, para. 3.8); while "*provisions in the DAMS are sufficient to **enable the SSWSIs to draw productively and collaboratively on the implications of the new research in finalising the detailing of the programme of archaeological mitigation***" (*ibid.*, paras. 2.6.1; 2.6.11; but see also paras. 2.6.3–4), are hardly compelling endorsements and may implicitly accept limits to the capabilities and efficacy of the mitigation strategy. They crucially omit to allow for the timeframe for data-gathering and interpretation necessary to lead to new research themes and changes in previous themes long after the Scheme would have been implemented. (Our emphases in bold.)

3.5.7. Historic England's confidence that features of the nature identified by the SHLP would also be identified in Scheme surveys and mitigation strategies adapted to deal with them (*ibid.*, paras. 2.5.1; 3.7) may be warranted. It is admitted, however, that "*conclusive answers will only be gained when it is possible to include systematic stratigraphic excavation to that range of survey and investigative techniques*" (*ibid.*, para.2.5.7). Moreover, even if unexpected finds are encountered on the Scheme (*ibid.*, para.2.6.1), Historic England gives no assurance that features of a very different nature from the pits identified by the SHLP and possibly not yet identified by researchers (present or future), would be recognized, recorded and treated appropriately by the developer.

We understand that it is already of major concern to specialists that what Historic England terms Highways England's "appropriate" and "proportionate" approach to archaeological mitigation (*ibid.*, para. 4.4) is little other than standard for development-led archaeology and would, e.g., in the case of proposed soil sieving percentages, lead to substantial loss of archaeological evidence. Nor, in view of what we have outlined above, can we have



confidence in the archaeological contractor to deal adequately with the multiple concerns highlighted (*cf. ibid.*, paras. 4.5–8).

3.5.8. This is underlined by conclusions in Historic England’s Section 4 which effectively say that the implications of the new find will be taken into account, largely in terms of research issues, without demonstrating that the ES documents will effectively address the full implications of the find – which go well beyond research issues – to ensure the development will not damage the WHS but instead protect it, as required under the terms of the WH Convention (please see our para. 1.5, above).

#### **4. Other considerations**

Wiltshire Council commented on the matters we raised concerning climate change and the future of transport policy. Dr Simon Temple, our specialist in transport matters, has answered Wiltshire Council’s remarks in the Annex to this response.

#### **5. Conclusions**

5.1. We gave our views on the implications of the new archaeological find in response to the Secretary of State’s 2<sup>nd</sup> Consultation (Stonehenge Alliance 2020a). Other responses to the 2<sup>nd</sup> Consultation, in particular those of the CBA, the Consortium of Archaeologists and ICOMOS-UK, have underpinned our conclusions, both as to the find itself and to its implications for the Development and any harm it might cause to the WHS.

5.2. All interested parties agree that more work is needed to enhance understanding of the Durrington pits: their origins and functions over time and their place in the archaeological record. Most agree that the new find should be considered significant in the context of the WHS and its OUV. A simple glance at the plan of these large features and the disparate location of similarly-sized pits in the landscape indicates that the pit configuration around Durrington Walls henge is obvious, unique and likely to have had a peculiar significance to those who occupied the landscape in the past.

5.3. The new SHLP find has both underlined and drawn out for debate the time, detailed work and expertise needed to examine geophysical evidence, assemble and analyse data (including that from extensive excavations), look for potential comparisons and pose and revise questions and theories: all necessarily lengthy and detailed processes with time frames that far exceed that of comparatively rapid evaluation and excavation ahead of a road scheme which, because of necessary speed and cost limitations, would inevitably result in permanent loss of evidence and opportunities for effective and comprehensive studies now and in the future. These facts are implicit in the response of Government adviser Historic England and, to a lesser extent and for different reasons in that of Wiltshire Council. They are evident in all the responses made by objectors to the Scheme that explore the implications of the new find and the plain impossibility of addressing them adequately through provisions of the relevant DCO documents.

5.4. Scheme supporters have failed to acknowledge the fact that archaeological investigation of a transect across the WHS cannot be considered a useful research exercise. Not being designed to target specific areas to seek answers to specific questions, it cannot

retrospectively be made to fit such questions either on the hoof or at conclusion. At best it is a rescue operation from which an incomplete record is gained. Some evidence will be sampled and retained according to present-day understanding while some will be missed, going unrecognized for what it may be or represent at the present time/state of knowledge.

5.5. The new find has again revealed misunderstandings of the Applicant and Scheme supporters of the concept of OUV which has led them to misinterpret ICOMOS' guidance, disregard the obligations of the WH Convention and assert that the Scheme would protect the WHS. It is also notable that the Applicant and Scheme supporters all neglect to mention that the new find draws salutary attention to the importance of protecting the setting of the WHS – an NPSNN requirement (DfT 2014, e.g. paras. 5.122 and 5.128).

5.6. These fundamental misunderstandings serve to underline a glaring omission in the responses of the Applicant and other Scheme supporters: the concept of the WHS as a landscape that was experienced by people who moved through it; who lived in and used it for multiple purposes related to it and their environment. Lip service is paid by Scheme supporters to the importance of the WHS landscape who then fail to take proper account of it in assessing the overall impact of the Scheme. The landscape, with its interrelated monuments and sites, both inside the WHS and within its setting, is a primary factor for serious professionals working in the WHS and close to it – recent research projects even include “Landscape” in their titles. The report on developer-led excavations at Durrington Walls refers to it as a matter of course (Thompson & Powell 2018, e.g., p.110, “Discussion: Late Neolithic”) as do others working on MoD land north of the WHS (e.g., Wessex Archaeology 2014, paras. 4.3.10; 4.4.4–16). Proximity and/or visibility of monuments and sites to the Scheme is irrelevant to recognition of the landscape as an integrated whole. The WHS is not simply a collection of heritage assets around which a line has been drawn but a palimpsest of interrelated assets comprising a single heritage asset of the “highest significance”.

5.7. ICOMOS-UK concludes:

*“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 largescale 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.”* (ICOMOS-UK 2020, Conclusion: 4.1)

5.8. The Council for British Archaeology (CBA) has admirably encapsulated the implications of the new find in their proper context in respect of the NPSNN and other policy documents (CBA 2020, paras 79–85: “Residual effects and risks and policy context”).

The CBA noted that

*“The ideas and interpretations conveyed now are far richer, more complex and insightful than was the case only half a generation ago. To suppose that present day archaeologists, scientists or others know how their ideas will stand up to future scrutiny, or what future generations will put most value in, is pure hubris. In the context of Stonehenge this policy provision [NPSNN: DfT 2014, para.5.129] requires the utmost caution and humility, a fully precautionary approach should be adopted so that the limitations of present day values and*

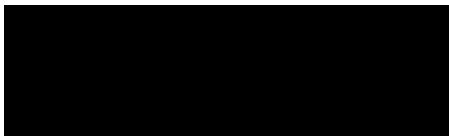
*ideas – advanced as they may seem now – should NOT be allowed to result in the loss of physical remains that with new techniques, ideas and values may be far more important in future than they seem at present.” (Ibid., para. 82). And recommends that:*

*“The Secretary of State should recognise the far-reaching implications of the identification of a major new monument as proposed by Gaffney et al, and in particular the salutary lessons it poses concerning how development can destroy, or render inaccessible for reinvestigation, archaeological remains of great importance whose significance may only emerge when new questions are asked or new techniques applied. Given the policy context and outstanding shortcomings of the DAMS he should give serious weight to concerns not only that the overall heritage balance has been misjudged, but that the approach to mitigation through DAMS remains flawed and insufficient to be a properly precautionary approach.” (Ibid., para. 85, “Recommendation”)*

We are entirely in agreement with these conclusions.

5.9. We hope, having consulted on the implications of the new find for the Development, that you will recognize that the responses received from objectors to the Scheme and from Government’s adviser Historic England have highlighted that these implications are both many and varied. Since it would be impossible to address them adequately via the Scheme as it stands, we hope that you will decide to refuse the DCO application.

Yours sincerely,



(Dr) Kate Fielden  
Hon Secretary

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**ANNEX** by Dr Simon Temple

**Response to comments by Wiltshire Council on matters raised by the Stonehenge Alliance concerning transport and climate change issues**

Section 3 of Wiltshire Council's response to the Secretary of State's Consultation comments on The Stonehenge Alliance's representations in relation to reports from the Institution of Civil Engineers (ICE) and the Committee on Climate Change (CCC), together with the Office of Rail and Road's call for a stock take on RIS2.

A core argument of the ICE's paper "Covid-19 and the new normal for infrastructure systems" is that infrastructure programmes must fulfil the twin aims of meeting the UK's future infrastructure needs and help to rebuild the economy from the severe recession resulting from Covid-19. The paper warns against the "temptation to turn the infrastructure fiscal lever in an unsophisticated way". This is wholly consistent with the Prime Minister's statement that "we owe it to future generations to build back better and base our recovery on solid foundations, including a fairer, greener and more resilient global economy."<sup>1</sup>

In the section dealing with "Systemic Lessons from Covid-19", the first point made is that the pandemic has refocused connectivity with much greater focus on digital rather than physical connectivity. While the document acknowledges that "there continues to be a significant demand for multi-modal transport networks", it highlights the "requirement to accommodate future uncertainty that may impact demand". This indicates the need for a refocus of investment with greater priority given to digital infrastructure and, within the transport sector, to move away from projects, such as A303 Stonehenge, where the business case is very dependent on continuing growth in road traffic.

Wiltshire Council ignores these key points and asserts, without evidence, that "there will continue to be a strong requirement for all of the strategic outcomes set out by Highways England (HE) in their Development Consent Order (DCO) application". The Council argues that the most significant impacts of Covid-19 relate to travel within towns and cities and contrast this with "strategic infrastructure", by which they appear to mean inter-urban transport networks. This is a false distinction since most journeys start or finish (or both) in urban areas. Wiltshire Council themselves quote the report as stating "UK cities will need to move quickly to deliver increased space for safe walking and cycling to disincentivise the use of cars." Clearly projects that have the effect of increasing the number of vehicles entering cities is contrary to this.

In our previous representation, The Stonehenge Alliance quoted the CCC as stating "that investments in low-carbon and climate adaption infrastructure must be at the heart of measures to restore economic growth following COVID-19," and then referred to the need to prioritise investment in digital technology rather than strengthening the road network, to promote home working.

Wiltshire Council dismiss this on the narrow grounds that the "A303 at Stonehenge is not a road which serves principally commuting work trip traffic during its periods of peak flows".

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<sup>1</sup> Quoted in BusinessGreen, 28<sup>th</sup> May 2020. <https://www.businessgreen.com/news/4015783/boris-johnson-owe-future-generations-build>

In reality, changing work trip patterns relate to business trips as well as commuting and a key argument put forward by the Promoter in support of the project is that it is alleged to speed up business travel. In their appraisal, this accounted for the majority of the alleged time saving benefits of the project.

In any case, Highways England's own appraisal showed that the project would increase carbon emissions contrary to the CCC's argument that low-carbon projects should be at the heart of measures to restore growth.

In relation to the Office of Rail and Road's call for a review of the road programme for the remainder of RIS2 and beyond, Wiltshire Council quote the Chief Executive as stating that this should occur "at an appropriate point". They do "not interpret this to mean that any scheme currently at DCO stage should be considered for abandonment or deferral". In reality many of the projects planned for delivery by the end of RIS2 are already in the DCO process so the scope of any review that accepted this restriction would necessarily be limited. In the Stonehenge Alliance's view the Covid-19 pandemic has created such major changes that now is clearly an appropriate point for a review of the road programme.

At the time of writing, the Climate Assembly Report *The Path to Net Zero*<sup>2</sup> has just been published. It concluded that there should be "a reduction in the amount we use cars by 2-5% per decade", in addition to the rapid phasing out of new fossil fuel cars and improvements to public transport. This further demonstrates that it is no longer appropriate to progress projects which assume traffic levels will continue to grow and which will themselves encourage this to occur.

In a similar vein, the Secretary of State for Transport, in his Ministerial Forward to the DfT document *Decarbonising Transport: Setting the Challenge*,<sup>3</sup> stated "Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less and be able to rely on a convenient, cost effective and coherent public transport network."

Overall Wiltshire Council's comments demonstrate a single minded determination to support the A303 Stonehenge project despite rapidly increasing evidence that the assumption of ongoing traffic growth on which it depends is very uncertain, would be undesirable if it occurred and is contrary to policies to achieve net zero carbon emissions. This is out of harmony with the Council's own agreed aim for net zero carbon emissions by 2030 – twenty years earlier than the Government's target. The Stonehenge Alliance agrees with the need for infrastructure investment to overcome existing shortcomings and to assist economic recovery. However, we strongly believe that this investment should be targeted so that it supports an accelerated move towards net zero carbon emissions, rather than taking forward projects – such as A303 Stonehenge – which work against this aim.

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<sup>2</sup> Climate Assembly UK, "The Path to Net Zero. Climate Assembly UK, 10 September 2020. <https://www.climateassembly.uk/report/>

<sup>3</sup> Department for Transport, "Decarbonising Transport: Setting the Challenge", DfT, March 2020. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/878642/decarbonising-transport-setting-the-challenge.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/878642/decarbonising-transport-setting-the-challenge.pdf)