

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,
Great Minster House,
33 Horseferry Road,
London SW1P 4DR.

Sent by email on 13 August 2020 to:

A303Stonehenge@planninginspectorate.gov.uk

and TRANSPORTINFRASTRUCTURE@dft.gov.uk

Dear Secretary of State,

A303 STONEHENGE: REQUEST FOR COMMENTS AND FURTHER INFORMATION

Response from the Stonehenge Alliance: Reference No. 2001870

Thank you for inviting us to respond to your second consultation with our further representations on the recent archaeological discovery by the Hidden Landscapes Project. The Campaign to Protect Rural England, as a supporter-organization of the Stonehenge Alliance, joins in this response.

1. Implications of the archaeological find for the Development and any harm it may cause to the World Heritage

We have already commented on the new find [1] but would like to raise the following additional points.

1.1. Full understanding of the Durrington pits feature and its relationship(s) to other archaeological monuments and sites in the WHS has not been reached: further investigation is needed over time. This major find is associated with one of the key upstanding monuments in the WHS. It also appears to be associated with the much earlier Larkhill causewayed enclosure and, possibly, with other sub-surface archaeological features, both known and unknown.

1.2. The siting of the Durrington pits feature in the landscape and the potential for greater understanding of the WHS

1.2.1. The Durrington pits feature is of 'landscape' scale and sited in topographical and physical/visual relationships with other monuments and sites in the WHS; it is thus an element of the sixth attribute of the WHS's OUV:

The disposition, physical remains and settings of the Neolithic and Bronze Age funerary, ceremonial and other monuments and sites of the period, which together form a landscape without parallel. [2]

This attribute derives from the second criterion for designation of the WHS:

Criterion (ii): The World Heritage Property provides an outstanding illustration of the evolution of monument construction and of the continual use and shaping of the landscape over more than 2000 years, from the early Neolithic to the Bronze Age. The monuments and landscape have had an unwavering influence on architects, artists, historians, and archaeologists, and still retain huge potential for future research. [3]

1.2.2. The WHS Management Plan expands on this with the following description:

“The design, position and interrelationship of the monuments are evidence of a highly organised prehistoric society able to impose its concepts on the environment. In some parts of the WHS, monuments or groups of monuments, such as the King Barrow Ridge barrow cemetery, Stonehenge and the Normanton Down barrow cemetery, are so well-preserved and prominent that they and their physical and topographical interrelationships form immediately recognisable parts of an archaeological landscape.” [4]

1.2.3. The complex of known monuments and sites within the WHS and its setting has led to the WHS being considered a ‘designed landscape’, created over time, constituent parts being respected and/or incorporated by later inhabitants and builders. The Stonehenge Alliance included discussion on this subject in representations to the Examination.[5]

1.2.4. A recent video digitally reproduces such physical and topographical interrelationships in views towards the Durrington pits feature on a walk along the Stonehenge Avenue. [6] The original appearance of the Durrington pits feature is, of course, unknown at present – as is the vegetation cover over time. That journeys through the WHS landscape may have had particular significance to those who travelled them has been recognized for many years [7] but present-day technology now allows evocative demonstration of the interconnectedness of archaeological features of the WHS both with one another and with the landscape as one moves through it. Future advances in technology, knowledge and understanding could allow even greater appreciation and comprehension of the WHS landscape, its uses and development. The imposition of major new road engineering and tunnel portals would further damage the setting of the Avenue and the eastern approaches to Stonehenge in an area which, because of the new discovery, has become a focus of particular interest.

1.3. The new find is located partly within and partly outside the designated WHS

1.3.1. The location of the new find emphasizes the importance of protecting the WHS’ setting. Measures to protect the setting have, unfortunately, not been adequately undertaken in recent years, leaving only the southern and parts of the western settings of the WHS least affected by modern built development.

1.3.2. Nowadays, buffer zones are required at designation where necessary for the protection of a WHS property. [8] Owing to its early designation, the Stonehenge WHS lacks a buffer zone. However, in addition to the safeguards for protection of the WHS and its setting in Local Plan policy, a setting study will be undertaken as an agreed WHS Management Plan policy.

*“The Wiltshire Core Strategy includes a specific robust policy relating to the Stonehenge and Avebury World Heritage Site. Policy 59 sets out to ensure the protection of the WHS and its setting from inappropriate development in order to sustain its OUV. The policy highlights the need to produce supplementary planning guidance – possibly a Supplementary Planning Document (SPD) – to assist in articulating the spatial implications of the attributes of OUV. ([Management Plan] **Policy 1b/Action 4**) It also underlines the need to protect the setting of the WHS to sustain the OUV and highlights the need for a Setting Study. ([Management Plan] **Policy 2b/Action 15**).” [9]*

1.3.3. A WHS boundary review may also be undertaken at some future time. [10]

1.3.4. Among other recognized monuments and sites associated with the archaeology of the WHS and located partially athwart or not far beyond the WHS boundary are, by Longbarrow Roundabout, two scheduled monuments: a linear feature and a Bronze Age enclosure. It would obviously be advantageous to protect the setting of the WHS here – to extend the boundary westwards to include and eventually restore the settings of these features as well as other important archaeological monuments and remains at this sensitive location – but this would be impossible were the proposed Development to go ahead. Major new discoveries in the NE corner of the WHS and beyond it are now compromised by built development: an unfortunate example of recent neglect of Government’s policy commitments to protect the WHS’ setting. This should lend weight to rejection of the proposed A303 Scheme owing to the highly adverse impact it would have on the western setting of the WHS and its known and unknown archaeology.

1.4. Sinkholes (i.e., possible solution and/or subsidence features)

1.4.1. The Stonehenge Alliance, in its representations on the known and unknown geological, hydrogeological and geotechnical aspects of the WHS, has referred to the presence of sinkholes in archaeological contexts in evidence to the Examination, largely in relation to the possibility of ground movement and subsequent archaeological damage arising from tunnel boring. [11] We have made similar post-Examination representations, emphasizing that there are no known strategies for appropriately monitoring tunnel boring vibration and preventing archaeological damage arising from it.[12]

1.4.2. It is not surprising to us that some of the Durrington pits were mistaken for sinkholes or appear to be reused sinkholes: it underlines the fact that sinkholes and solution hollows occur widely over the WHS, some of them re-used in an archaeological context; some of them possibly unidentified as such within the trace of the proposed Development. We agree with Dr Garwood’s observations in his recent paper on the Durrington pits.[13]

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

2.1. The Environmental Statement

2.1.1. That a major new site in the WHS should have been identified only now is a strong indication that other sites, both major and minor, are yet to be discovered elsewhere within the WHS and its setting, potentially within, across or partly across the trace of the proposed Development. The data obtained by the Stonehenge Hidden Landscapes Project – a more sophisticated and thorough exercise than that undertaken for Highways England’s

evaluation of the land required for the proposed Development [14] – awaits full analysis and will inevitably prove to be the source of further new finds, re-assessments and hypotheses. Evaluation of any proposed development impacting on the WHS and/or its setting ought to be conducted on research lines to obtain maximum information – and bearing in mind the potential importance of that information if it can be re-examined under future investigative techniques. There can be little doubt that an unknown amount of archaeological evidence has already been missed and indeed lost in Highways England’s evaluation work to date; far more would be lost should the Scheme go ahead.

2.1.2. *The Heritage Impact Assessment* needs revision to include the new find, its location and significance and potential for greater understanding of the WHS.

At the same time, the impacts of the proposed Development on both the WHS and its setting should be evaluated properly: a requirement hitherto not undertaken, as was pointed out by us [15] and, notably, ICOMOS-UK during the Examination. [16]

2.3. *The Draft Archaeological Mitigation Strategy* is not fit for purpose. We are in complete agreement with the views of Dr Garwood on this matter. [17] We suggest that the magnitude of the damage the Development would cause to the WHS and its setting would render the “mitigation” proposed shockingly ineffective in a WHS designated for its archaeological and archaeological landscape qualities. The new find, one of many more to be revealed as research continues over time, serves to underline the importance of protecting the whole WHS and ensuring that any necessary modern intervention is undertaken on research-led principles.

2.4. *The World Heritage Convention and planning policy* have not been properly addressed in the Environmental Statement and appropriate revisions are needed.

Although the new find provides clear evidence that the “archaeological landscape” extends beyond the WHS, the WHS boundary was defined to include all recognized elements of what was identified in 1986 and continues today to be a “landscape without parallel”. Apart from HMG’s commitment to protect the designated WHS property under the WH Convention, there is a raft of protective policy and guidance designed to ensure that commitment is met. We gave evidence to the Examination on this issue [18] and endorse the submissions of Victoria Hutton. [19]

3. In conclusion

3.1. We support the points raised by Victoria Hutton, on behalf of the Consortium of Archaeologists and the Blick Mead Project Team concerning re-opening of the Examination of the DCO application to allow the implications of the new find for the proposed Development to be discussed by all interested parties. [20] Re-opening the Examination might also provide an opportunity to discuss the implications of data from the critical winter tranche of groundwater pumping tests not yet undertaken.[21]

3.2. In our recent representation to you, [22] we pointed out that since the A303 Stonehenge Examination, the Covid-19 pandemic along with mounting anxiety about climate change are now prominent issues of concern to us all. They have brought considerable changes in aspects of our daily lives, including work styles and travel habits. The future implications of these changes are unknown and are particularly relevant in respect of road transport. There is very obviously an urgent need to reconsider the roads

infrastructure programme. Furthermore, since we last wrote to you, we know that Transport Action Network has been given permission to proceed with its legal challenge to RIS2, to be fast-tracked for a full hearing by November. This clearly has implications for the A303 Stonehenge Scheme.

3.3. We are concerned that the delayed decision means that any grant of DCO in November 2020 would be taken almost 25 months after the submission of the application and 13 months after the examination concluded. It is therefore highly likely that surveys conducted by Highways England as part of the ES will be out of date.

3.4. Similarly, changes in GDP projections and population forecasts since the application was submitted are likely to have a further negative impact on the already tenuous economic case for the Scheme.

3.5. Finally, we would like to draw your attention to the petition set up by the Stonehenge Alliance. Since the new Durrington pits find was widely published in the media, there has been an overwhelming response to our petition.[23] The number of signatures has more than doubled since we handed the first tranche of signatures in to 10 Downing Street on 19 February 2020. There are now over 120,000 signatures against the proposed Development, primarily from members of the public in the UK but including a substantial number from over 100 countries around the world. They echo the concerns of UNESCO's World Heritage Committee and there can be little doubt that the eyes of the World are watching with incredulity the progress of the proposed Development and its potential impact on our shared heritage.

Given all the matters raised in this letter, we very much hope that you will be minded not to approve the DCO application.

Yours sincerely, etc.



(Dr) Kate Fielden
Hon. Secretary to the Stonehenge Alliance

The Stonehenge Alliance supporter-organizations are:
Ancient Sacred Landscape Network, Campaign to Protect Rural England,
Friends of the Earth, Rescue: The British Archaeological Trust
and Transport Action Network.

Notes

1. Stonehenge Alliance to the Secretary of State, 26.6.20:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001961-Stonehenge%20Alliance.pdf>

2. S. Simmonds, and Thomas, B., *Stonehenge, Avebury and Associated Sites Management Plan*, 2015, p.32. http://www.stonehengeandaveburywhs.org/assets/2015-MANAGEMENT-PLAN_LOW-RES.pdf

3. *Ibid.*, p.26.
4. *Ibid.*, p.34, para.2.3.21.
5. Stonehenge Alliance, REP2-136: Written Representation on Principal Issue 9: Heritage and the Historic Environment; in particular, paras. 2.3–2.6.
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000754-Stonehenge%20Alliance%20-%20Written%20Representation%20on%20Principal%20Issue%209%20Heritage%20and%20the%20Historic%20Environment.pdf>
6. Simon Banton, ‘Avenue Walk and the Durrington Walls Pits’ *Stonehenge Monument* blog, 24 July 2020: <http://www.stonehengemonument.co.uk/2020/07/avenue-walk-and-durrington-walls-pits.html>
7. See, e.g., Exon, S., V.Gaffney, A.Woodward, R.Yorston, *Stonehenge Landscapes: Journeys through real-and-imagined worlds*, Archaeopress, 2000.
https://www.academia.edu/4237406/Stonehenge_Landscapes_Journeys_Through_Real-And-Imagined_Worlds._Exon_S_Gaffney_V_Yorston_R_and_Woodward_A
8. *Operational Guidelines for the Implementation of the World Heritage Convention*, UNESCO, July 2019, para. 104. <https://whc.unesco.org/en/guidelines/>
9. Simmonds & Thomas, *op.cit.*, p.84, para.7.2.7; see also pp.93–5.
10. *Ibid.*, pp.92–3.
11. *Inter alia*, Stonehenge Alliance, REP2-131, Written Representation on Flood Risk, groundwater protection and land contamination by Dr G.M.Reeves, CGeol CEnv PhD MSc BSc FGS FIMMM: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000753-Stonehenge%20Alliance%20-%20Written%20Representation%20on%20Flood%20Risk%20groundwater%20protection.pdf> and REP8-052, Summary of oral submissions at ISH8: Cultural Heritage, landscape and visual effects and design, Section 4.3.iv: Ground Movement Monitoring Strategy, a) Through the OEMP? <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001588-Stonehenge%20Alliance%20-%20Written%20Summaries%20of%20Oral%20submissions%20at%20Issue%20Specific%20Hearing%2008.pdf>.
12. Stonehenge Alliance letters to Transport Secretary, 16 May 2020: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001944-Stonehenge%20Alliance%20-%20Response%20to%20SoS%20Consultation%201.pdf> and 28 May 2020 (not published): <http://stonehengealliance.org.uk/wp-content/uploads/2020/08/Stonehenge-Alliance-comments-28.5.20-on-responses-to-SoSs-queries-of-4.5.20-etc.-redacted.pdf>. See also, e.g., ICOMOS-UK, REP6-054, Comments on Examining Authority’s Second Written Questions: NS 2.7 and NS 2.8: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001371-ICOMOS-UK-%20Response%20to%20Examining%20Authority%E2%80%99s%20Second%20Round%20of%20Written%20Questions.pdf>; and Annex by Alan Baxter, REP6-055: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001372-ICOMOS-UK-%20Annex%20-%20Alan%20Baxter.pdf>.
13. Paul Garwood, “The implications of the Durrington pits monumental structure and other pit discoveries in the Stonehenge landscape for the A303 road scheme” in Submissions on Behalf of the Consortium of Archaeologists and the Blick Mead Project Team: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001960-Consortium%20of%20Archaeologists%20and%20the%20Blick%20Mead%20Project%20Team.pdf>
14. *Ibid.*, para. 4.
15. Stonehenge Alliance, e.g., REP2-136, sections 1.3.4.2–1.3.8. (See Note 5, above, for website link.)

16. In particular, ICOMOS-UK, *op.cit.*, HW 2.1, LV 2.1 and LV 2.4,
17. Paul Garwood, *op.cit.*, paras.3 and 5.
18. Stonehenge Alliance, REP2-134, Written Representation on Principal Issue 3: “Alternatives”; in particular, Sections 3–5. <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000751-Stonehenge%20Alliance%20-%20Written%20Representation%20on%20Principal%20Issue%203%20alternatives.pdf>
19. Most recently, Victoria Hutton, in Submissions on Behalf of the Consortium of Archaeologists and the Blick Mead Project Team: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001960-Consortium%20of%20Archaeologists%20and%20the%20Blick%20Mead%20Project%20Team.pdf>.
20. Victoria Hutton, *op.cit.*, para.13.
21. Stonehenge Alliance, letter to Transport Secretary, 28 May 2020 (not published; also referred to, with link, under note 12, above).
22. Stonehenge Alliance to the Secretary of State, 26.June 2020: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001961-Stonehenge%20Alliance.pdf>.
23. 38 Degrees (for UK signatories): <https://you.38degrees.org.uk/petitions/save-stonehenge-world-heritage-site>; Change.Org. (for signatories from the UK and abroad): <https://www.change.org/p/save-stonehenge-world-heritage-site-to-the-secretary-of-state-for-transport-secretary-of-state-for-culture-media-sport-uk-government-save-stonehenge-world-heritage-site>.