

From: Kate Fielden [REDACTED]

Sent: 26 June 2020 10:56

To: TransportSecretary <TransportSecretary@dft.gov.uk>

Cc: TRANSPORTINFRASTRUCTURE <TRANSPORTINFRASTRUCTURE@dft.gov.uk>; Rob Pridham <Rob.Pridham@dft.gov.uk>; 'A303 Stonehenge' <A303Stonehenge@planninginspectorate.gov.uk>; [REDACTED]

Subject: A303 Stonehenge

Importance: High

For the attention of The Rt. Hon. Grant Shapps, MP, Secretary of State for Transport, please

C/O Ms Susan Anderson and Mr Rob Pridham

Dear Ms Anderson and Mr Pridham,

I would be grateful if you should, please, ensure that the attached letter is forwarded to the Secretary of State.

Please would you also send me acknowledgement of receipt of my letter?

Yours sincerely,

Kate Fielden

Hon Secretary to the Stonehenge Alliance

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## 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 Susan Anderson,  
Head of Transport Infrastructure Planning Unit,  
Great Minster House,  
33 Horseferry Road,  
London SW1P 4DR.

Sent by email on 26 June 2020 to:  
[TRANSPORTINFRASTRUCTURE@dft.gov.uk](mailto:TRANSPORTINFRASTRUCTURE@dft.gov.uk) and  
[A303Stonehenge@planninginspectorate.gov.uk](mailto:A303Stonehenge@planninginspectorate.gov.uk)

Dear Secretary of State,

### **A303 Stonehenge**

I wrote to you on 28 May with our comments on responses to your request for comments and further information on various issues in your letter of 4 May 2020 addressed to Highways England, Historic England and Natural England.

Since then significant new issues have arisen which we hope you will wish to take into account in making your decision on the A303 Stonehenge Scheme.

#### **1. A major new archaeological discovery within the WHS [1]**

The nature and scale of a partial ring of substantial Neolithic pits, apparently centred around Durrington Walls henge, point only too clearly to the potential number and significance of other archaeological sites in the WHS landscape which remain hidden or unidentified. Some may already appear on survey plots that await detailed analysis. Pit-like features may be natural or man-made or a combination of both. Others, like the new find, may have been partially damaged by development and might not be fully understood. The new findings, in our view, require revision of the Heritage Impact Assessment (HIA) undertaken by Highways England.

Such is the scale and configuration of the new feature that, should a similar pit formation straddle the trace of the Expressway route, it would not have been identified in the archaeological evaluation undertaken for Highways England; while a single pit or element of it, if present, would not have been recognized for what it was.

This raises further questions about the adequacy of the Detailed Archaeological Mitigation Strategy (DAMS) and the incomplete archaeological record obtained by only partial evaluation.

#### **2. Recent advice arising from consideration of the implications of Coronavirus**

2.1. The May 2020 **Institute of Civil Engineers'** Green Paper and Report, *Covid-19 and the new normal for infrastructure systems*, [2] raises pertinent issues and questions concerning changes in infrastructure demands following Covid-19, coupled with the urgent need for net-zero carbon emissions by 2050. New methods of connectivity including digital working, a significant demand for multi-modal transport networks and public expectation that climate change will be fully addressed – along with scientific advice in decision-making and political will to address unprecedented challenges are all highlighted. “A rapid review of major transport programmes to assess what needs to be rephased” is recommended but the outcome of any such review is unknown.

2.2. The **Office of Rail and Road** has also called on Highways England and the Department for Transport jointly with the ORR to take stock of the roads investment strategy for the remainder of the road period and beyond. [3] This involves RIS2 projects, including the A303 Stonehenge Scheme.

2.3. The Executive Summary of the **Committee on Climate Change's** *Reducing UK emissions: 2020 Progress Report to Parliament* (25.6.20) [4] says that, in terms of net zero carbon emissions, “we are not making adequate progress in preparing for climate change”; and, on p.142, it states that “Overall, the Committee recommends that investments in low-carbon and climate adaptation infrastructure must be at the heart of measures to restore economic growth following COVID-19.” The report places emphasis on home working, stating that “higher investment in resilient digital technology including 5G and fibre broadband should therefore be prioritised over strengthening the roads network” (p.152 and, similarly, on pp. 145 and 179).

### **3. Transport Action Network's legal challenge to RIS2**


We are aware that the legal challenge now under way may take some time before being heard in Court and, possibly, challenged on Appeal. In view of the unknown outcome of this action, it therefore appears to us that it might be helpful to allow more time before any decision is made to proceed with the A303 Stonehenge Scheme.

#### **In conclusion**

We would suggest that the new issues that have arisen since completion of the A303 Stonehenge Examination are of such relevance that they should be subject of changes to the EIA, HIA and the DAMS, along with re-opening of the Examination to allow open discussion by interested parties and reconsideration of the evidence before a decision on the Scheme is made. These issues include:

- reassessing the HIA in the light of the new archaeological findings and the significance of the WHS;
- proper protection of the WHS and its archaeology in view of their potential for future understanding;
- the need for thorough reassessment of the future of RIS2 and the A303 Scheme following Covid-19; and
- the advisability of awaiting the outcome of the legal challenge to RIS2.

Yours sincerely,



Kate Fielden (Dr)  
Hon. Secretary

#### *Notes*

1. V. Gaffney *et al.*, “A massive, Late Neolithic Pit Structure associated with Durrington Walls Henge”, *Internet Archaeology* 55; 2020, <https://intarch.ac.uk/journal/issue55/4/index.html>
2. Chris Richards, *Covid-19 and the new normal for infrastructure systems*, <https://www.ice.org.uk/news-and-insight/policy/covid-19-and-the-new-normal-for-infrastructure> Green Paper and Report, Institution of Civil Engineers, May 2020
3. Rob Horgan, “Regulator calls for stocktake of £27bn roads plan to assess impact of Covid-19”, *New Civil Engineer*, 12 June 2020. <https://www.newcivilengineer.com/latest/regulator-calls-for-stocktake-of-27bn-roads-plan-to-assess-impact-of-covid-19-12-06-2020/>
4. Committee on Climate Change, *Reducing UK emissions: 2020 Progress Report to Parliament*, 25 June 2020.

<https://www.theccc.org.uk/publication/reducing-uk-emissions-2020-progress-report-to-parliament/>