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Head of Transport
Infrastructure Planning Unit
Department of Transport
Great Minster House
London
SW1P 4DR

By EMAIL ONLY: A303Stonehenge@planninginspectorate.gov.uk

13 August 2020

PINS reference No TRO10025

Dear ,

Please find below English Heritage's response to information requested in your letter of 16th July as outlined below.

In light of the archaeological find (the late Neolithic Pit Structure associated with Durrington Walls Henge), 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.*

Introduction

As you are aware English Heritage (EH) cares for over 400 historic buildings, monuments and sites across the country. In our role as an independent charity, our purpose is to conserve these sites to the highest standards possible, in keeping with their status as part of England's national heritage.

The prehistoric stone circle of Stonehenge is the best known site within our care and as part of the wider World Heritage Site (WHS), it is a powerful witness to the once great communities of both the Neolithic and Bronze Age. We also have Woodhenge and part of Durrington Walls in our care, in guardianship for the nation.

English Heritage has already seen the benefits of removing the old visitor facilities adjacent to the Stones and the grassing over of the A344. We consider that the current proposed A303 road scheme has the potential to transform the Stonehenge part of the World Heritage Site landscape. As we have always stated, provided it is well designed and located sensitively, this scheme could greatly enhance the Outstanding Universal Value (OUV) of the World Heritage Site whilst simultaneously improving the setting of the Stones themselves, and people's experience of them, by the removal of the surface road.

6th Floor, 100 Wood Street, London, EC2V 7AN EHT.ChiefExecutive@english-heritage.org.uk

+44 (0) 20 7973 3381 english-heritage.org.uk

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In terms of answering the two questions posed above we shall be answering as one of the major land leaseholders and heritage managers in the WHS.

Questions

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

The newly discovered arc of deep pits, centered on the late Neolithic henge monument at Durrington Walls, is undoubtedly an interesting discovery not least because of its scale.

(2020: A massive, Late Neolithic pit structure associated with Durrington Walls Henge, *Internet Archaeology* 55. (<https://intarch.ac.uk/journal/issue55/4/index.html>).

However, although preliminary analysis through coring has produced one late Neolithic date, suggesting that at least some of the pits were open during this period, there is little secure dating evidence available. It is not yet clear whether these pits are natural solution hollows or artificial shafts; whether they are chronologically similar and were all open at the same time; or how they relate to other monuments in the landscape, not least Woodhenge and Durrington Walls which they seem to encompass, and Stonehenge itself, which is approximately 2km away.

The pits were discovered through a combination of research-led geophysical survey and developer-funded archaeological excavation, a similar archaeological mitigation strategy to that which will be employed during works along the road corridor of the Development (see the discussion of the Detailed Archaeological Mitigation Strategy, below).

Conclusion 1: English Heritage considers that the new discovery at Durrington Walls needs to be treated by Highways England as a new ‘heritage asset’ within the World Heritage Site. Any potential impact of the proposed road scheme on the pit structures and their setting needs to be considered, which is already allowed for in the mitigation strategy. The consideration will necessarily be preliminary, however because the arc of pits is poorly understood at present; the discovery is at too early a stage for it to contribute to knowledge of the monuments within the World Heritage site. It is also at some distance from the proposed Development.

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

As English Heritage is represented on HMAG and the Scientific Committee of experts advising Highways England, we have been party to the development of Highways England’s DCO documentation, including the Applicant’s Environmental Statement (ES), the Heritage Impact Assessment (HIA) and the Detailed Archaeological Mitigation Strategy (DAMS). We have also been consulted on the various stages of the archaeological evaluation works to date, undertaken to inform the HIA.

Implications for the Environmental Statement, including the Heritage Impact Assessment

The Environmental Statement (ES) encompasses every aspect of the natural and historic environment. English Heritage has been particularly involved in Appendix 6.I the Heritage Impact Assessment.



The Heritage Impact Assessment of the scheme outlines the criteria used to assess heritage assets (Table 6.2 Pg. 6-8 Environmental Statement) and the scope of works on the Outstanding Universal Value (OUV) of the World Heritage Site. The study area extended 500m from the DCO boundary. However, this study only included sites that were known about at the time of writing (July 2018) and so presently does not include the new discovery at Durrington Walls amongst the assets assessed.

Conclusion 2: English Heritage considers that the discovery of the pit circuit does not imply that the heritage assessments by Highways England were not rigorous enough; such assessments can only be reasonably written with the information available at that time. Furthermore, an iterative and reflexive process of assessment for new discoveries is already built in to the DAMS for the Development (see below).

Some of the work already carried out by Highways England is relevant to the current discussion. Within the evaluations for the Western and Eastern ends of the scheme including the tunnel portal, similar pits were found and recorded, some by coring in a similar manner to the Stonehenge Hidden Landscapes Project (SHLP). The rationale and methodology for this work was clearly set out in the Archaeological Reports e.g. from the Eastern Portal (HE551506-AMW-HER-Z4-GN_000_Z-RP-LH-0001). Here, work on features that appeared to be natural in addition to archaeological features were included in the evaluation. At the western portal end, further relevant features were encountered and assessed. (HE551506-AMW HER - Z2_ML_M00_Z -RP-LH-0001, 5.2.3)

Conclusion 3: English Heritage considers that the methodology for the assessment of the new discovery at Durrington Walls by Highways England could usefully be informed by work previously carried out by Highways England, specifically but not exclusively, the evaluations noted above.

Implications for the Detailed Archaeological Mitigation Strategy (DAMS, September 2019).

The DAMS clearly states that an iterative approach will be taken to all archaeological work. It also highlights very strongly that research questions must always be at the forefront of the minds of the developer.

Relevant sections include 2.3.1, Objective 3, *'Promote high quality research using innovative methodologies and reflexive approaches to explore a transect through the landscape and test existing landscape models, develop new research questions...'*

Section 3.2.2 includes an overview of relevant evaluations and academic projects which are published and at 3.2.3 the techniques to be employed in the mitigation phase are highlighted

- Detailed magnetometer survey across the area defined by the Scheme boundary, supplemented by targeted GPR surveys;
- Ploughzone artefact collection within the Scheme main line footprint and land take for landscaping and excavated material deposition, as follows:
Within the WHS: field walking (where ground conditions permitted), hand sieved test pits and sieving of topsoil excavated in trial trenches;
Outside the WHS: field walking and sieving of topsoil excavated in trial trenches.
- Trial trenching and geo-archaeological investigations.

All the proposed work is related to an Archaeological Research Agenda (ARA) and refers to all the relevant research agendas already published particularly for the WHS.



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The DAMS goes on to detail the proposed Mitigation Strategy.

5.1.2 In respect of archaeological remains within the footprint of the Scheme, a comprehensive programme of archaeological mitigation fieldwork and recording will be implemented. This will include archaeological excavations, recording, reporting, publication, and dissemination to local communities, the wider general public and academics.

The archaeological mitigation programme will address the Archaeological Research Agenda (ARA,) (of the DAMS) and will be undertaken to the highest practicable standards, employing innovative data collection approaches and techniques. The question-led approach will aim to contribute to the corpus of archaeological research and understanding to mitigate the loss of archaeological remains.

There is also provision for unexpected discoveries (6. 5. 8.)

In the event of an unexpected discovery requiring further investigation (that is, a significant find that was not predicted as a result of the evaluation), the provisions set out at 6.1.19 above will apply.

Conclusion 4: English Heritage considers that in dealing with the new discovery at Durrington Walls Highways England should take the opportunity to promote the high quality of research that is discussed in the DAMS. We believe that the Scientific Committee formed to advise on research questions will be able to help formulate any further specific methodologies and mitigation strategies for this new discovery.

Conclusion 5: The mitigation strategy set out in the DAMS is already comprehensive. If any unexpected discoveries are made within the boundaries of the Development, that were not predicted as a result of earlier evaluation, then these processes should be followed and informed by further consultation with the Scientific Committee.

English Heritage always welcomes new research on Stonehenge and its landscape and the other monuments in its care, such as Woodhenge and part of Durrington Walls. We believe that the current proposed A303 road scheme, if sensitively designed and if progressed in line with the high quality research standards already defined in its documentation, could greatly enhance the World Heritage Site, improving the setting of Stones and people's experience of them. We look forward to the results of the on-going research on the massive pit structure associated with Durrington Walls and to the opportunity to assimilate this new information into our public engagement and interpretation at Stonehenge.

Yours sincerely,

Kate Mavor
Chief Executive