

**A303 Amesbury to Berwick Down
(Stonehenge) Wiltshire
TR010025**

**Wiltshire Council (A303-AFP022)
Comments on 8.11 Draft Detailed
Archaeological Mitigation Strategy
(000776) Submitted at Deadline 2**

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1. Introduction

The Council is pleased to see the development of the draft Detailed Archaeological Mitigation Strategy (DAMS) submitted to the Examining Authority (Deadline 2 version). The DAMS is a crucial strategy in the DCO application, which when approved will provide the requisite rationale for and details of a consistent approach to be taken to essential archaeological mitigation required to make the Scheme's direct impact on archaeological remains acceptable.

2. Wiltshire Council's Comments on the DAMS

The Council, in its role as local authority and statutory consultee, has already commented on the Outline Archaeological Mitigation Strategy (OAMS), the precursor to the draft DAMS, submitted with the draft DCO. In addition, through its role on HMAG, the Council has commented on two previous versions of the draft DAMS. This version submitted to the Examining Authority, although still in development, is a detailed document which uses the results of the archaeological evaluation programme to target key areas of the Scheme for either preservation in situ or further fieldwork and excavation. Alongside the draft DAMS is a draft Outline Written Scheme of Investigation (OWSI) which sets out the methodologies to be used in the implementation of the mitigation strategy, including the approach to archiving, reporting, publication and dissemination of the results. The Council is particularly pleased to see a strategy for public archaeology and community engagement detailed as part of this.

The Council is content with the direction of development of DAMS and OWSI, although there are several areas where additional mitigation is required and further assessment and details need to be incorporated into the document before it can be considered final and approved. The Council expects to be fully engaged in the further development of this document into a final version prior to the close of the Examination. The DAMS will need to be a certified document, with its implementation secured by a DCO Requirement.

Areas of the document that need further detail, agreement and approval are set out below.

Deposition of Tunnel Arisings at Parsonage Down East

The Scheme proposes to deposit the arisings from the tunnel boring within this area of the landscape outside the WHS. It is proposed to preserve known archaeological features beneath the spoil from the tunnel and to create a chalk grassland habitat. The spoil will arise from the tunnel boring machine as slurry, which will then be treated and redeposited.

The Council currently has insufficient information to agree the proposed approach for landscape fill set out in section 4.2.9. Additional information has been requested by the Council and Historic England and until this has been made available and agreed a robust strategy for the preservation in situ or full excavation of archaeological features prior to deposition of tunnel arisings on Parsonage Down East cannot be confirmed and approved.

Mitigation of Main Road Line Outside the WHS

The Council's view is that the current mitigation measures proposed outside of the WHS are not extensive enough. For example, the whole of the road line outside of the WHS (including junctions and slips roads) should be subject to some form of mitigation. This needs to be reflected in section 4.2.4 and Appendix E fieldwork action areas. The Council's concern is the high risk of discreet archaeological remains, some of which may have attributes of Outstanding Universal Value, being present but not detected in the evaluation process.

Sampling Approach and Excavation

A robust methodology needs to be agreed for further assessment and mitigation of artefacts in the topsoil in areas to be excavated, as referred to in section 4.3.5 and 5.3.11-13. Further information on the nature and extent of lithics from the evaluation phase has been requested from Highways England. This information has been presented to the Council and HMAG in draft form and made some proposals for further work at mitigation stage, which are yet to be agreed.

In addition, a robust strategy for sampling natural features such as tree hollows also needs to be agreed and approved. Further information has been sought from Highways England and this is in the process of being presented to HMAG.

Section 5.3 sets out the general machine excavation approach. 5.3.4 refers to monitoring of machine stripping to be undertaken by a qualified archaeologist. The Council would emphasise that this task is one of the most important in the whole mitigation programme and the archaeologist(s) undertaking it must not only be qualified but also highly experienced.

The level of sampling of features referred to in section 5.3.26-36 needs to be agreed and approved. A minimum percentage of sampling for all likely feature types should be set out in the DAMS but subject to refinement on site during monitoring visits.

Treasure

The procedure for dealing with the unexpected discovery of treasure items (referred to in section 5.3.73) must include promptly informing the Wiltshire Finds Liaison Officer for the Portable Antiquities Scheme and the Wiltshire Archaeology Service.

Contingency and Procedure for Dealing with Unexpected Discoveries

There needs to be a robust contingency policy in place to deal with unexpected discoveries which are significant and will require further mitigation, not only for the preliminary works stage but for the main works. This is referred to briefly in sections 4.1.15, 5.1.2 and 5.1.15-17. This policy needs to be developed and expanded in detail and approved within the final version of the DAMS. It is imperative that the policy for dealing with this during main works phase is agreed in the DAMS and as well as the CEMP.

Interruptions and Delays

Section 5.1.18 sets out circumstances where work on site may have to be suspended if conditions are poor and continued works activity may lead to damage to archaeological remains. This section requires further detail. It is important to note here that the Council, as lead curator, must not only be informed if this is the case, but must also be able to monitor site conditions and require works to cease.

Detailed Mitigation Measures by Scheme Area

The Council needs to assess, agree and approve the detail contained in Appendix D – preservation areas, and Appendix E – proposed archaeological fieldwork areas. For some of these areas additional information has been requested and the Council is not currently able to approve the proposed

approach in this version of the document. It is therefore likely that the number of sites referred to in section 4.3.2-6 will need to be revised.

Compounds

The details of proposed ground works in each of the compound areas needs to be set out in the DAMS along with mitigations principles and measures. Given that some of the compounds contain significant archaeological features, and / or are near the WHS boundary, the mitigation details and protection of archaeological remains need to be agreed in advance of any consent for the scheme being given.

Temporary Roads and Haul Roads

The detail of the exact location and construction methods for temporary and haul roads still needs to be agreed and approved.

Strategy for Digital Data

It is good to see this section (5.9) included in the draft DAMS. The proposed digital data management plan must include the provision of a timetable for the transfer of digital data to the Council's Historic Environment Record (HER) to enable the results of the fieldwork to be rapidly and accurately imported into the HER and the public record. This also needs to be reflected in the publication proposal in section 8.2.3. There needs to be an agreed and approved process for enabling the reports and digital datasets to be easily transcribed onto the HER.

Public Archaeology and Community Engagement

The Council welcomes the inclusion of this section (4.4) in the draft DAMS and the strategy (Appendix F) which aims to deliver a legacy from the archaeological investigations undertaken for the Scheme. It is good to see the principles in place, although the details of the activities proposed, methods for delivery and timescales will have to be agreed and approved as part of the overall development of the DAMS during the Examination.

The Council notes that section 5.1.14 states that the implementation of the strategy will fall to the archaeological contractor, but this has not yet been agreed and other means of delivery need to also be considered. It is also considered that the strategy must include site based activities (F14.2.2) and therefore the strategy and personnel to implement it must be in place at the start of preliminary works phase. Additionally, the strategy should have a stronger focus than as presently drafted on all the phases of archaeological work associated with the Scheme, including the initial assessment work for route selection and the evaluation phase of fieldwork. A greater focus on the World Heritage Site and issues of Outstanding Universal Value would be beneficial as would linking the strategy into work-streams of existing heritage education groups and networks.

Approval and Sign-Off of Archaeological Mitigation Works

The Council is pleased to see the Communication Strategy in section 2 and Appendix A setting out the process of approvals and sign-off areas of archaeological mitigation. Some of the detail here needs further development and clarification to make the procedure for sign-off and compliance as robust as possible and to secure the Council's involvement in this process as the local authority and lead curator.

To avoid confusion, it is important to be clear that the role of HMAG is advisory and pertains to works within the WHS only. This is also the case for the Scientific Committee. Wiltshire Council has a

statutory role in approving archaeological works for the entire Scheme for the local planning authority as does Historic England in relation to designated heritage assets for DCMS. Therefore, the National Trust and English Heritage Trust will not be able to approve or sign-off archaeological works. This needs to be adequately reflected in the flowcharts in Appendix A where the advisory roles and statutory roles need to be separated out. These flowcharts need further clarity as well to indicate that Highways England is not giving itself final approval / sign-off of archaeological specifications and fieldwork.

The sign-off procedure (section 7.5) must include a site inspection and written confirmation from the Council's Archaeology Service.

Progress reporting (7.3) will need to include items on site conditions and any delays caused by weather plus plans and photographs and any agreed changes to programme or policy and approach.

3. Conclusion

In summary, the Council is content with the direction of development of the DAMS. However, further detail on some areas is required and the Council needs to further assess some elements of the mitigation proposals, especially details in Appendices D and E and specific aspects of the proposed mitigation strategy such as the mitigation approach to Parsonage Down East, and mitigation approach to the road line outside the WHS. Currently, the Council is not content with the extent of archaeological mitigation proposed outside of the WHS. Once the further information requested has been submitted, the Council needs to assess and discuss these issues with HMAG and members of the Scientific Committee. Therefore, the Council is still some way off from being able to provide its full advice on and approval of the draft DAMS.

It is essential that the Council is fully engaged with the further development of the draft DAMS and that the document is secured as part of any consent given to the Scheme, meets all the Council's requirements and applies the highest standards of mitigation possible in this internationally significant landscape.