

**Highways England: A303 Amesbury to Berwick Down Project,
Development Consent Order Application**

Scheme Reference: TR010025

**Comments on Highways England Deadline 4 submission:
the Draft DAMS (REP4-024)**

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Stonehenge Alliance's comments on Highways England Deadline 4 submission: the Draft DAMS (REP4-024)

1. DDAMS Section 2. Principles for archaeological mitigation

1.1. DDAMS Section 2.2. General Principles

1.1.1. Para. 2.2.2 of the dDAMS provides a set of principles *"to guide actions to ensure the conservation of heritage assets throughout the WHS and within the Scheme."*

1.1.2. In para.2.2.3 of the document, Highways England recognizes (last bullet point) that ploughzone scatters of artefacts "may" contribute to OUV. However, it is now clear from analysis of material from evaluation that such scatters can in some instances be all that is left of settlement remains, i.e., 'associated sites' and that they must therefore be counted as attributes of OUV and heritage assets in their own right. No account appears has been taken of this crucial evidence in Highways England's overall assessment of the impact of the scheme on the WHS.

Should that assessment be revised?

1.2. DDAMS Section 2.3. Detailed Principles

In para. 2.3.1 of the dDAMS we note the bullet point principle which reads *"Do not harm the integrity or authenticity of the WHS or the assets that contribute to the OUV of the WHS"*. This important principle has not so far been adopted, nor would it be employed if the Scheme were to be implemented.

2. DDAMS Section 3. Archaeological research strategy

2.1. The dDAMS, at para.3.3.4, says *"The Scheme has been designed to avoid impacts upon known elements of the archaeological resource. Nonetheless, both inside and beyond the WHS, new evidence has been produced."* Paras. 3.3.17ff. of the dDAMS list significant finds: i.e., attributes of OUV or sites/features/artefacts related and complementary to the attributes of OUV of the WHS.

2.2. The updated dDAMS provides compelling evidence that substantially more is now known about previously unknown sites/features on the trace of the Scheme with the potential for the existence of further sites, features, burials (i.e., attributes of OUV) in the areas of the cuttings, tunnel portals and the proposed new Longbarrow junction. The evaluation work has produced evidence of earlier and later periods which is also of crucial importance to the development of the WHS over time. The scheme would no longer be seen to *"avoid impacts upon known elements of the archaeological resource"*.

2.3. In view of the major potential for careful (and time-consuming) research in these areas and in light of the principles mentioned above in dDAMS Sections 2.2 and 2.3, should the scheme now be reconsidered before more of the resource is lost, most notably that which relates to the OUV of the WHS?

2.4. It is evident that the “Research Questions” following sections detailing archaeology and new finds would fail to be adequately answered in the context of the large-scale destruction and small-scale sampling proposed.

3. DDAMS Appendix E. Public Archaeology and Community Engagement Strategy

3.1. E.14.1. Summary

Despite the laudable aims of the PACE strategy as set out in dDAMS paras E.14.1.1–2, it cannot be denied that the Scheme would cause major damage to the WHS landscape and its setting, and considerable loss of crucial archaeological evidence. These concerns are already apparent in widespread public condemnation of the Scheme and are reflected in the 2019 Decision on Stonehenge by UNESCO’s World Heritage Committee.