

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

**Wiltshire Council (A303-AFP022)  
Comments on 8.11 (Rev 1) Draft  
Detailed Archaeological Mitigation  
Strategy (001128)**

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## 1. Introduction

The Council is pleased to see the further development of the draft Detailed Archaeological Mitigation Strategy (DAMS) submitted to the Examining Authority (Deadline 4 version). The DAMS is a crucial strategy in the DCO application, which when approved will provide the requisite rationale for a consistent approach to be taken to essential archaeological mitigation required to make the Scheme 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 as well several prior versions of the draft DAMS. The Council is pleased that the current version does take into account the majority of the feedback the Council has already provided. Wiltshire Council is particularly pleased to see the further development and enhancement of the strategy for public archaeology and community engagement detailed as part of this (Appendix E).

The Council is content with the direction of development and for the most part with the level of details in the DAMS. However, there are several areas of the Scheme where additional mitigation is required and further assessment needs to be provided before it can be considered final and approved by the Council. 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 section of the landscape outside the WHS and creation of a chalk grassland habitat. The archaeological mitigation proposed for this area is a combination of excavation and preservation in situ of known archaeological remains.

The method to be used to manufacture and distribute the chalk slurry to be deposited on Parsonage Down East has been discussed with Highways England (HE) over the last few weeks. Some of the details of the method are still unclear as are the implications for any preservation of archaeological remains that will be buried. The Council has requested further information to help inform the decision-making process, including further analysis and assessment of the archaeological remains in the area for proposed deposition of tunnel arisings. The Council would like to see an assessment that pulls together all the findings from the different phases of work, both non-intrusive and the trenching, to address the nature, condition and chronology of the remains. This will help the Council to have a clearer indication of the significance of the remains in relation to the wider landscape context and allow the development of research questions to be focused on during the mitigation phase.

Furthermore, HE will need to demonstrate that preservation in situ of archaeological remains can be fully achieved in line with Historic England's relevant guidelines.

Until the additional information has been received and assessed, the 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.

It is likely that the Council will require further field evaluation (trenching and geophysical survey) and / or mitigation than currently proposed.

#### Mitigation of Main Road Line Outside the WHS

The Council acknowledges that further mitigation areas have been included in this revised version of the DAMS. However, this is still not extensive enough. This is a rich archaeological landscape and with the evaluation sample level of 5% applied, the Council would expect many smaller discreet archaeological sites such as pits, postholes and burials which lie outside the currently proposed mitigation areas. In consideration of this important prehistoric landscape, the Council requires the whole of the road line outside of the World Heritage Site (WHS) (including junctions and slip roads) to be subject to some form of mitigation and this needs to be reflected in Appendix D, fieldwork action areas and Sections 5.3.4-5. The mitigation measures outlined in 5.2.5 need to include preservation in situ.

#### Archaeological Research Strategy

The Council notes that Section 3.1 principally refers to the Stonehenge and Avebury Archaeological Research Framework (2016) and the Council advise that there are others, including specialist research frameworks that should also be included and referred to here. For the Roman period, the Roman Rural Settlement Project findings and research themes need to be considered.

The Council notes there are no research questions relating to the Wessex Linears (Section 3.5) and an opportunity could be taken here to target parts of these features where dating evidence can be retrieved.

Sections 3.6 and 3.7 only have a small number of research questions for the Iron Age, Roman and Medieval periods. The Council would like to see these enhanced, as there is more archaeological potential than currently included, particularly for areas outside the WHS. Improving the understanding of the relationship between field systems and settlements in these periods could be a priority. Research questions aimed at improving understanding of the flood plain deposits of the River Avon to the east of the WHS would also be useful (Section 4.3).

#### Top Soil Sampling Approach

A robust methodology still needs to be agreed for further assessment and mitigation of artefacts in the topsoil in areas to be mitigated. Further information on the nature and extent of lithics from the evaluation phase has been requested from Highways England to help inform the decision making on this issue.

In addition, the DAMS needs to include a strategy for the mitigation of any in situ lithic scatters that may be found during mitigation.

#### Sampling Approach to Excavation of Features

The level of sampling of features referred to in Sections 6.3.31 to 6.3.44 needs to be agreed and approved. A minimum percentage of sampling for all likely feature types should be set out in the DAMS. In addition, a strategy for the sampling of any prehistoric roundhouses needs to be included within this section.

### Principles for Archaeological Mitigation (Section 2.3)

The Council advises that this section should require all field staff involved in the mitigation to undertake a Scheme specific training programme. This could include an induction to the specific sampling requirements.

In addition, it would be advisable to edit the principle set out in the 9<sup>th</sup> bullet point to “avoid and minimise harm to the integrity and authenticity of the WHS and the assets that contribute to the Outstanding Universal Value (OUV) of the WHS.”

### Contingency and Procedure for Dealing with Unexpected Discoveries

Procedures for dealing with unexpected finds are referred to several times within the document. The Council suggested that these references are brought together in one place. Reference to unexpected “finds” is misleading and should be replaced with “unexpected discovery of significant features”. 6.1.17 notes that HMAG / WCAS will be consulted on the procedure for dealing with unexpected discoveries. The Council contends that the Local Authority should be able to authorise / approve the procedure rather than just be consulted with.

### Interruptions and Delays

Section 6.1.20 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. It is important to note here that the Council, as lead curator, must not only be consulted if this is the case, but be able to monitor site conditions and have the ability to require works to cease.

### Temporary Haul Roads

Additional clarification is needed to set out that measures can be reversed without impact on archaeological remains, and that any topsoil removal must be kept to the absolute minimum (5.2.37).

### 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 Sections 4.3.2-6 will need to be revised.

Whilst most of the mitigation work will take place in the Preliminary Works phase, the Council notes that Section 5.1.7 refers to some potential overlap with the Main Works phase. There needs to be a mechanism for managing any overlap, especially if different archaeological contractors are employed for each phase. Wiltshire Council would like some input into the documentation and tender process in terms of selecting appropriate archaeological contractors as referred to in 5.1.9.

Tunnel movement monitoring stations are still under discussion (Sections 5.2.6-8); Wiltshire Council favours an approach which has no ground intrusion.

### Digital Data Management Plan

It is good to see this Section (6.9.9) included in the draft DAMS. However, further detail needs to be added to confirm the timeframe for its approval and that this will be developed and approved before the start of the mitigation phase for both Preliminary Works and Main Works stages. There also needs to be confirmation that the local authority will be able to approve the final version of the management plan.

### Public Archaeology and Community Engagement

The Council welcomes the inclusion of this Section (5.4) and the additional information requested in the draft DAMS and the Strategy (Appendix E) which aims to deliver a legacy from the archaeological investigations undertaken for the Scheme. The key sections the Council thinks is missing now is one on implementation and approval. The final version of the DAMS needs to include an Action Plan for delivery for the strategy and an agreed timetable, which needs to state that the delivery will start before the archaeological mitigation works commence. There needs to be confirmation of which organisation(s) will approve and sign-off on the delivery of the actions.

### Approval and Sign-Off of Archaeological Mitigation Works and Related Documentation

The Council is pleased to see the further development of the Communication Strategy in Section 2 and Appendix A setting out the organisations involved in the sign-off process. However, the Council thinks more detail is needed to further clarify and highlight the approving bodies for all documentation and all stages of mitigation. There needs to be a clear distinction between organisations consulted (advisory role) and those that are consulted and are approving (statutory roles). It is particularly important to emphasise the role of the local authority archaeology service as the approving body for all the Site Specific Written Schemes of Investigation. In relation to roles and responsibilities, it would be useful if Section 1.3 cross references to Appendix A, and Section 1.3.3 emphasises that the approval / sign-off at the site visits will be done by the statutory bodies only.

## **3. Conclusion**

In summary, whilst the Council is content with the direction of development of the DAMS and its level of detail for the most part, some further detail is required as is enhancement of mitigation proposals in some areas. Currently, the Council are not content with the extent of archaeological mitigation proposed outside of the WHS. Once the further information requested has been submitted and assessed and the further mitigation measures incorporated into the next version of the document, the Council will be closer to being able to approve a document that meets all of the Council's requirements and applies the highest standards of mitigation appropriate to this internationally significant landscape.