

Comments on the updated dDAMS (draft Detailed Archaeological Mitigation Strategy) released on 26 July 2019)

A303 Amesbury to Berwick Down 8 TR010025 Deadline 6 8.11 (Rev 2) – Draft Detailed Archaeological Mitigation Strategy (DAMS) (TRACKED CHANGES version)

1. The strategy proposed for ploughzone artefact collection (pp. 84-85, sections 6.3.11-6.3.18) is still wholly inadequate and would result in the loss of approximately 500,000 artefacts and the associated information about the prehistoric activities from which they derive. This is an unacceptable loss for the WHS.

2. This matter was discussed at length at the Scientific Committee meeting of 2 July where the committee were overwhelmingly in favour of 100% sampling of topsoil within the western and eastern approaches within the WHS. Yet this recommendation has not been taken up in the updated dDAMS.

3. At paragraph 6.3.15, the dDAMS states that ‘statistical analysis of the distribution of the artefacts recovered in the 1% evaluation test pit sample... will be developed to inform the identification of a representative sample size and distribution’. Yet previous archaeological excavations west of Stonehenge in 2008 by the Stonehenge Riverside Project have demonstrated that any sampling of less than 50% across entire excavated areas has an insufficient probability of recovering enough diagnostic artefacts to allow characterisation and dating of the human activities that survive only as these distributions of stone tools and other artefacts in the ploughzone. Only 100% sampling provides full recovery of the diagnostic lithic artefacts. These make up less than 2% of the lithic assemblage; without a suitable sample of these diagnostic stone tools, the dating and characterisation of the human activity is simply not possible. These ploughzone assemblages are predominantly the only surviving prehistoric remains in these affected areas of the WHS.

4. The current requirement for 100% sampling of ploughsoil on 1m grids in areas of high potential within the Stonehenge and Avebury WHS, enforced by archaeological curators (County Council, Historic England, National Trust), should apply to all work within the WHS, including development projects. In addition, no one area within the road’s footprint in the WHS is any less important than any other. We cannot have one rule for research excavations and another rule for others within the WHS.

5. Highways England appears to be unwilling to meet the required archaeological standard of 100% ploughzone recovery in the WHS. Since this has been standard practice in both Stonehenge and Avebury areas of the WHS for the last ten years, they should have known all along and should have planned for this from the beginning. Their preparations have been totally inadequate, lacking adequate early consultation on this standard practice within the WHS. The scale of the work required is indicative of the enormous extent of the destruction proposed within the WHS. HE probably sees the huge scale of 100% ploughzone recovery as unfeasible. Yet we do not accept that they have carte blanche to destroy archaeological evidence in circumstances where any other archaeologist would be required to meet the industry standard, simply because of the huge size of the area affected.