



Historic England

**SUBMISSION
ON BEHALF OF THE
HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND
(HISTORIC ENGLAND)
("HBMCE")**

**Planning Act 2008 and The Infrastructure Planning (Examination Procedure)
Rules 2010**

**Application by Highways England ("the Applicant") for an Order granting
Development Consent for the construction of a new two-lane dual carriage way
for the A303 between Amesbury and Berwick Down in Wiltshire.**

PINS Reference No: TR010025

HBMCE Reference No: 20019871

13 August 2020



SUMMARY OF POSITION

Historic England considers that the A303 assessments were sufficiently rigorous to inform determination of the Scheme and development of an archaeological mitigation strategy. The recently published research does not change our view of those assessments.

The Stonehenge Hidden Landscapes Project (SHLP) report comprises an interpretation of preliminary results and its authors have indicated that further work is required. Nonetheless, we consider that the matters raised by this recently published research highlight the importance of understanding the pattern and distribution of both natural features and human activity within the Stonehenge landscape. The work of the SHLP team has posed a series of questions which when explored may provide new insight with potential to influence the further development of the Scheme archaeological research framework.

In our opinion the provisions in the Detailed Archaeological Method Statement (DAMS) are sufficient to enable the Site Specific Written Schemes of Investigations (SSWSIs) to draw on the implications of the SHLP research in finalising the detailing of the programme of archaeological mitigation should the Scheme be granted consent. Safeguards have been included within the DAMS and Outline Environmental Management Plan (OEMP) to facilitate the integration of the matters raised by the research into the approach taken to the Scheme.

The development of the SSWSIs, including through a series of Technical Workshops to draw on the expertise of the A303 Scientific Committee, will facilitate development of site specific research frameworks to inform a reflexive and proportionate approach to sampling on the basis of significance and Outstanding Universal Value (OUV), as outlined in the DAMS. This process is intended to enable the consideration of recent and evolving research, as well as the development of new research questions to tackle the nature of the relationship between natural features, their appreciation by human populations, and the surrounding landscape. It must ensure that investigation is able to characterise these relationships by seeking to clarify the pattern of deposition of cultural material and those processes that will subsequently have affected its preservation in the archaeological record.



Due to the specialist nature of this consultation, should the Secretary of State have any additional queries, either in relation to our comments below or the responses from other Interested Parties to the Secretary of State's letter, we would be pleased to continue to offer further assistance.

1. INTRODUCTION

1.1. Historic England is the government's statutory adviser on all matters relating to the historic environment, including world heritage. It is our duty under the provisions of the National Heritage Act 1983 (as amended) to secure the preservation and enhancement of the historic environment.

1.2. We understand that following a recent archaeological discovery by the Stonehenge Hidden Landscapes Project and receipt of further representations submitted citing the discovery, the Secretary of State has decided that it would be appropriate to consult on these before determining the Application.

1.3. We note that the Secretary of State has requested recipients of his letter to provide any comment they have on the matters raised in the Stonehenge Hidden Landscapes Project report and representations relating to the archaeological find at the World Heritage Site. We note also that the Secretary of State would welcome the views of Historic England, among others, on the

- 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.

1.4. In responding to this consultation Historic England, in line with our advice to the Examining Authority throughout the Examination, has sought to focus on advising on those matters that will assist and inform understanding of the implications for the historic environment arising from the Scheme and the newly published research.



1.5. To that end we have focused exclusively on the heritage related matters raised in the report and representations received in line with our remit and will not be commenting in relation to the other matters raised.

2. OBSERVATIONS ON MATTERS RAISED IN THE HIDDEN LANDSCAPES PROJECT REPORT AND REPRESENTATIONS RECEIVED

2.1. In reviewing the recently published report on this new research we have focused on its implications for our understanding of the WHS landscape. Under Sections 3 and 4 of this submission we have subsequently addressed the specific questions posed by the Secretary of State, drawing holistically on our observations on the matters raised in both the project report and representations received.

2.2. Observations on Matters Raised in the Stonehenge Hidden Landscapes Project Research

2.2.1. **Historic England considers that the matters raised in the SHLP publication highlight the importance of the continued development of theories and methods that have potential to enhance our understanding of the relationship between natural features in the Stonehenge landscape and human activity. Archaeological research in general has demonstrated the value of an integrated strategy for survey and investigation as a best practice approach to the examination of how such features may have been appreciated and used by prehistoric communities. Any strategy should be guided by the development of a series of nuanced research questions that tackle the relationship between natural features, their material fills, each other, and with other features within the landscape. Research questions should also seek to clarify the pattern of deposition of any cultural material and the taphonomic processes that have subsequently affected the stratigraphic sequence. In this way it should be possible to work towards a clearer understanding of the relationship between human activity and the natural landscape.**



2.2.2. The summary to the Stonehenge Hidden Landscapes Project (SHLP) report identifies *'a series of..geophysical anomalies, located south of the Durrington Walls henge monument'*. Some of these features are characterised as *'massive'*, having a *'surface diameter of 20m or more and a depth of at least 5m'*. The features are interpreted on a landscape scale as representing a group of features *'related to the henge at Durrington Walls'* and interpreted as a potential elaboration of the monument complex on a landscape scale. Characterisation of the features through geophysical survey, reinterpretation of the results of commercial excavation of the surface expression of the features, and borehole investigation of select features enabled preliminary conclusions to be reached and the identification of new research questions to resolve the full chronology and cultural context of the features and their relationship with the monument at Durrington Walls.

2.2.3. The report highlights the need to better understand the nature of pits or shafts within this period and landscape more generally. There are significant interpretive challenges associated with understanding how natural features might have been used, reused or modified in different ways by human populations. This is a phenomenon recognised more widely than just within the landscape of the Stonehenge WHS. Whilst the proliferation of solution hollows in the chalk landscape of the Salisbury Plain is well recognised the positioning and distribution of such features is not yet well understood.

2.2.4. Understanding the positioning and patterning of solution hollows within the landscape and their causal factors, which may include geological or topographic influences, may be addressed through deposit modelling of the Stonehenge WHS landscape. Landscape based research questions need to be devised that specifically seek to understand the natural environment geology and topography as context to the human activity and interaction within it.



- 2.2.5. Comparison between boreholes within this landscape will facilitate more detailed interpretation of individual features and the results of this most recent work and add further value to our understanding from both.
- 2.2.6. Boreholes are an essential investigative technique, but they cannot in all situations provide conclusive evidence because they provide a vertical window through complex stratified deposits which cannot be properly understood without excavation. Whilst boreholes can provide some understanding of the structure of a feature they do not provide a full picture. The interpretation of a core of limited material without necessarily understanding what surrounds the core at depth can present challenges.
- 2.2.7. The value of an integrated approach to landscape scale investigations, employing a range of different techniques including a deposit model, scheme wide GIS and information from geophysical survey and LiDAR datasets, is in building up a robust interpretive baseline for the landscape. This integrated approach facilitates the testing and comparison of the conclusions from individual surveys and techniques against one another and so benefits our understanding of the results. In general, for example, the comparison of borehole results with GPR over the same features represents good practice.
- 2.2.8. Boreholes can provide clear evidence relating to the pattern of deposition within features of this nature. When material is identified at significant depth this can support a more reliable interpretation that it was deliberately placed rather than having been deposited by natural processes. At higher levels in the stratigraphic sequence this interpretation would be less certain.
- 2.2.9. However a truly nuanced interpretation of whether such structures were reused in their existing form or modified in some way can only be achieved through large scale excavation.
- 2.2.10. There are, however, major practical considerations associated with obtaining the evidence required. The scale of excavation that would be



required in relation to features comparable in size with the largest circular and sub circular features identified in the survey makes this particularly challenging. Consequently it is important to integrate the results of investigation undertaken both as part of academic research and commercial excavation to broaden the evidence base on which interpretations are constructed.

2.2.11. Experience shows that features of this nature may be interpreted as solely natural when a lack of cultural material is identified within a safe working depth, often around c. 2m. The direct involvement of a geoarchaeologist assessing the deposits on site is essential to ensure that the correct interpretation is reached.

2.2.12. Reliable dating is also essential to understand clearly the chronology of human activity associated with the use of natural features within the landscape. However, the nature of archaeological deposits means that material suitable for scientific dating is not always preserved. Therefore it is critical to ensure a detailed scientific dating strategy is systematically employed associated with clear research questions.

2.2.13 It is evident that in order to understand the potential use of these features in the broadest sense we must have a clear picture of the pattern of deposition of any cultural material and the taphonomic processes that have affected it subsequent to that deposition. This will enable differentiation between natural features which have either been reused and/or modified for cultural deposition, and anthropogenic features which may form part of a monument complex. It is essential that clearly defined research questions are developed that tackle the relationship spatially between these features, their chronology, their material fills, other features of broadly similar characteristics, and with topographic and geological features within the landscape. Research questions will need to take a landscape scale approach in recognition of the nature and extent of the Stonehenge WHS.



2.2.14 Research frameworks formulated to address these types of investigations will need to comprise a detailed scientific dating strategy to ensure that reliable chronologies are compiled. These will be essential to clarify whether activity relates to a clearly defined period or whether there is evidence for repeated patterns of activity sustained over a longer timeframe. The confirmation of such a pattern between natural features within the landscape might potentially be interpreted as evidence of a more symbolic, deliberate use.

2.2.15 The World Heritage Site at Stonehenge is one of the most important prehistoric landscapes in the world. Research such as this reminds us of the ability to revise our narratives by being open to new interpretations about how the landscape was used and experienced by Neolithic and Bronze Age communities. The process of reinterpretation of previous work and data and continued academic discourse is essential given the subjectivity of the process of archaeological interpretation. The work of the Stonehenge Hidden Landscapes Project team has posed a series of questions which when explored may provide new insight into a part of this story. Critical to our understanding of the spatial relationships between features within the Stonehenge WHS and its landscape will be the development of research frameworks and questions which include emerging themes of research.

2.3. Observations on Matters Raised in the Representations Received by the Secretary of State Citing the Research

2.3.1. We do not intend to focus on the detail of these representations, but will instead consider the matters raised more holistically in their wider context. This should not however be taken that an absence of comment is implicit agreement with comments made. We have undertaken to respond to the matters raised as requested by the Secretary of State.

2.3.2. We understand the points made by both parties within their representations to be as set out under sections 2.4-2.6 below:



2.4. Implications for Examination Documentation

2.4.1. **Historic England considers that the A303 assessments were sufficiently rigorous to inform determination of the Scheme and development of an appropriate and proportionate archaeological mitigation strategy. The recently published research does not change our view of those assessments. The Stonehenge Hidden Landscapes Project (SHLP) report comprises an interpretation of preliminary results and its authors have indicated that further work is required. Nonetheless, we consider that the matters raised by this recently published research highlight the importance of understanding the pattern and distribution of both natural features and human activity within the Stonehenge landscape. The work of the SHLP team has posed a series of questions which when explored may provide new insight with potential to influence the further development of the Scheme archaeological research framework. The existing processes and documentation set out under the DAMS and OEMP facilitate integration of the matters raised by the research into the approach taken to the Scheme under the Site Specific Written Schemes of Investigations (SSWSIs).**

2.4.2. The Environmental Impact Assessment (EIA) documentation, the Environmental Statement (ES), Heritage Impact Assessment (HIA) [APP-195] and associated baseline documentation included as appendices were produced prior to submission of the application in October 2018.

2.4.3. The ICOMOS 2011 guidance describes heritage impact assessment as an iterative process with the results of data collection and evaluation fed back into, for example, both the process of design for the development and proposals for archaeological investigation [ICOMOS 2011: 6-1]. The guidance also addresses the role of the HIA in indicating how the mitigation is acceptable in the context of sustaining the OUV of the WH property [ICOMOS 2011: 6-3].



- 2.4.4. The HIA and associated documentation considered the potential for both direct impacts from the scheme on designated and non-designated heritage assets and from within their settings. A Setting Assessment formed part of the baseline documentation [APP-218].
- 2.4.5. Historic England's objective through the course of the Examination was to ensure that the historic environment was fully and properly taken into account in the examination and determination of the application and, if consented, that appropriate safeguards were built into the Scheme across the dDCO (draft Development Consent Order), Outline Environmental Management Plan (OEMP) and Detailed Archaeological Mitigation Strategy (DAMS) [AS-111: 1.4].
- 2.4.6. During the course of the Examination where it was determined that further information was required to ensure that the Examining Authority had a clear understanding of the matters raised this was submitted and discussed both through written submissions, answers to specific questions from the Examining Authority, and verbally at a series of hearings.
- 2.4.7. Towards the conclusion of the Examination we confirmed that Highways England had broadly addressed any concerns we may have raised in relation to the HIA. We considered that given the thoroughness with which the Heritage Impact Assessment dealt with the effect of the Scheme on the SAAS WHS Attributes that it was broadly consistent with our understanding of how the ICOMOS 2011 Guidance on Heritage Impact Assessments for Cultural World Heritage Properties¹ should be applied. We confirmed that on the basis of the example criteria and thresholds set out in ICOMOS 2011, despite differences of opinion between Highways England and Historic England regarding the assessment of individual aspects of the Scheme, in relation to the overall assessment we broadly concurred with the assessment in the HIA [REP9-038: 1.7.1-1.7.3].
- 2.4.8. In our concluding submission to the Examining Authority we advised that we had completed our review of the final iterations of key documents

¹ https://www.icomos.org/world_heritage/HIA_20110201.pdf



forming part of the DCO and confirmed that the concerns we had raised had broadly been addressed. This followed extensive discussions on the dDCO (draft Development Consent Order) and its interaction and relationship with the DAMS and OEMP [AS-111: 1.6].

2.4.9. Had this research and its interpretation been available at the time of production of the documentation or during the course of the Examination Historic England consider that it would have been included and taken into account in the assessments produced by the Applicant. The proposed circuit of pits suggested in the newly published research is located outside of the DCO boundary. Consequently it would have been considered for potential impacts as a result of changes to its setting [ICOMOS 2011: 5-3] alongside, for example, confirmed heritage assets at Durrington Walls and Larkhill.

2.4.10. We consider that the assessments conducted under the Scheme were sufficiently rigorous to inform determination of the Scheme and development of an appropriate and proportionate archaeological mitigation strategy. The recently published research does not change our view of those assessments.

Detailed Archaeological Mitigation Strategy (DAMS)

2.4.11. Exploration of the research questions posed by the SHLP report would also inform the processes already set out in the DAMS for further development of research questions and methods of investigation to be set out in the SSWSIs [Document 8.11 (7)²: e.g. 1.1.3; 4.1.2; 4.2.1; 5.2.2].

2.4.12. The DAMS is underpinned by a series of Scheme specific research questions to ensure that an understanding of the OUV of the WHS and the significance of the historic environment overall will guide decision making and maximise opportunities to further understand this exceptional landscape. It ensures that the archaeological mitigation under the SSWSIs will be supported by the use of innovative methods and technologies and the implementation of an iterative and intelligent strategy, which will enable

² DAMS submitted by Highways England and published on the Planning Inspectorate's website on 19 May 2020.



it to make a unique contribution to international research agendas [AS-111: 1.8; Document 8.11 (7): 6.1.24].

2.4.13. The involvement of the Scientific Committee (on which one of the lead authors of the research sits) in the development of the Scheme research framework, and so in the detailing of strategies for e.g. scientific dating and environmental sampling will be essential. By convening a series of Technical Workshops to facilitate this engagement, the SSWSIs which flow from the overarching framework set out in the DAMS will be able to take account of emerging research themes rather than waiting for them to be published in established research frameworks or publications, or for the Stonehenge WHS or South West Research Frameworks to be formally updated.

2.4.14. HMAG have continued to discuss with Highways England specific provisions for such workshops in the SSWSIs on a series of agreed themes and outcomes. We are aware that Highways England has written to the Scientific Committee to indicate this approach to convening technical workshops and requested their contribution³.

Safeguards under Process for SSWSI Approval

2.4.15. A key objective for Historic England in our advice throughout the Examination and subsequently has been to ensure that the final version of the DAMS actively promoted and supported continued evolution of the mitigation strategy to be employed throughout the course of the Scheme. We have advocated therefore for a strategy with capacity to respond iteratively and reflexively to new information as it becomes available [Document 8.11 (7): e.g. 6.1.24; 6.3.7; 6.3.16; 7.4.1]. Due to both the continually evolving nature of archaeological research and the length of the proposed programme of archaeological mitigation and construction for this Scheme, we consider this an essential element of securing appropriate safeguards to ensure the continued relevance of the final mitigation strategy as work progresses.

³ As noted in Historic England's representation in May 2020.



2.4.16. The Reporting Criteria for SSWSIs set out in the OEMP [Document 6.3 (8)⁴] (PW-CH3; MW-CH9) and the DAMS [Document 8.11 (7): 6.1.3] require that they are produced in consultation with Wiltshire Council and Historic England and, for sites within or affecting the WHS, HMAG, and thereafter approved by Wiltshire Council (in consultation with Historic England) prior to the part of the main/preliminary works to which each SSWSI relates.

2.4.17. As a result Historic England considers in our role as a statutory consultee and advisor to the State Party, that there are sufficient safeguards already built into the DCO process to ensure that the results of this latest research, and its continued development under the additional work of the key authors and researchers, will be taken into account in the development of the mitigation strategy for the Scheme.

2.5. The identification and treatment under the Scheme of features of a similar nature to those included within the report

2.5.1. Historic England considers that the surveys conducted under the Scheme are adequate to detect features of the nature discussed in the report. We also consider that the DAMS sets out a process for refinement and enhancement of site specific mitigation strategies in the SSWSIs. The strategy is necessarily reflexive to enable a proportionate approach to be taken to sampling. This will allow resources to be directed to address carefully considered research questions focusing on understanding the significance of individual features and the OUV of the WHS.

2.5.2. On the Wiltshire chalk landscape prehistoric monuments appear to produce clear magnetic contrasts within the detection resolution of the magnetometers employed by both the A303 and SHLP project teams. We consider that the spatial resolution of the magnetic surveys undertaken on the Scheme would be adequate to detect any large pits of the diameter of those discussed in the SHLP report.

⁴ OEMP submitted by Highways England and published on the Planning Inspectorate's website on 19 May 2020.



2.5.3. In relation to the detection of smaller pit or posthole anomalies and any large scale arrangements thereof, we consider similarly that it is likely that any similar anomalies occurring in the A303 survey areas will have been identified. However, should further pit type features be discovered during the course of the programme, there is provision and flexibility to ensure that they are adequately assessed to determine their significance. In this event, further GPR survey and review of comparative datasets would potentially contextualise the features at their landscape scale, enhancing their interpretation.

2.5.4. Increasing the spatial resolution of survey and overlay of multiple survey techniques is most likely to reduce the potential that any such anomalies would not be picked up.

2.5.5. However, the interpretation of human agency through the identification of whether individual isolated discrete anomalies were created as pits, or reused or modified natural features and whether overall any spatial or functional patterning in the relationships between them would result from a deliberate and designed approach on a monumental scale lies beyond the scope of geophysical survey alone to confirm.

2.5.6. As discussed above there are complexities involved with the identification of human activity associated with the reuse and modification of natural features such as solution hollows. To enhance interpretation a combined and staged approach utilising a range of different survey and investigative techniques is best employed.

2.5.7. However, conclusive answers will only be gained when it is possible to include systematic stratigraphic excavation to that range of survey and investigative techniques.

2.5.8. Were such features as those discussed in the recently published research identified within the limits of the Scheme Historic England would, in our role as a member of HMAG and as a statutory consultee, advocate



for an investigative process to be implemented that would be considered appropriate to the significance of the feature. The overarching process is set out in the DAMS providing the framework through which site specific research questions included in the SSWSIs for the Scheme can be developed refined and enhanced.

2.5.9. The DAMS provides for a proportional approach to sampling with natural features that have been shown to contain archaeological remains to be completely excavated (100%) [Document 8.11 (7): 6.3.442] to inform our understanding of the OUV of the WHS and the individual significance of the features encountered. Historic England would expect to see any such features within the line of the Scheme investigated on the basis of an evolving research framework that has guided the development of a set of specific research questions and these in turn have informed the approach set out in the SSWSIs for the Scheme.

2.6. Dealing with New Discoveries within the WHS

2.6.1. Historic England considers that the provisions in the DAMS are sufficient to enable the SSWSIs to draw productively and collaboratively on the implications of the new research in finalising the detailing of the programme of archaeological mitigation in the event the Scheme is granted consent. We also consider that provision has been made in the DAMS for dealing with unexpected finds on the Scheme.

2.6.2. The WHS is already identified as being of international importance through its inscription and the number of nationally designated monuments that convey attributes of its OUV.

2.6.3. Nonetheless, new research reminds us of the ability to revise our narratives by being open to new interpretations about how this landscape was used and experienced by Neolithic and Bronze Age communities. Site specific research questions have yet to be devised on the basis of



the DAMS, but this process will assist in ensuring that an evolving approach is taken to development of the Scheme research framework.

2.6.4. These provisions include a process for investigation of features within the WHS at a level proportionate and sufficient to answer carefully constructed research questions that will ensure that appropriate investigative techniques are utilised to maximise our understanding of the archaeological resource encountered.

2.6.5. The work conducted on the Scheme to date and the advice provided by Historic England together with other members of HMAG has sought to reduce the likelihood that features of an unexpected nature will be identified during the course of the mitigation programme.

2.6.6. Despite this, unexpected finds must be provided for with a clear mechanism for them to be dealt with appropriately as required under the NPSNN 5.142. Consequently provision has been made in the DAMS for such eventualities [e.g. Document 8.11 (7): 6.1.19-21].

2.6.7. Further steps will be taken in the continued development of the strategy set out in the DAMS under the production of the SSWSIs and enhancement of the Archaeological Research framework for the Scheme to minimise the potential that any finds could be considered unexpected within the context of the WHS landscape.

2.6.8. It will be important to ensure that the site and scheme specific research questions included under the framework and which will inform the development of the SSWSIs are robust and ensure that the most appropriate techniques and investigative methods are properly applied in order to answer these questions.

2.6.9. The involvement of the Scientific Committee in this process is essential. One of the purposes of having a highly experienced group of specialists inputting to the development of the research framework and the detail of the methods and techniques to be employed under individual SSWSIs is to ensure that the OUV and significance of the WHS and the historic



environment in general are taken proper account of in the mitigation phase of the Scheme if consented.

2.6.10. The DAMS also makes specific provision for new research both on and beyond the Scheme to contribute to the development of the SSWSIs and the site specific research questions that will need to be developed in advance of any work commencing on site.

2.6.11. Historic England considers that the provisions in the DAMS enable the SSWSIs to draw productively and collaboratively on the implications of the new research in finalising the detailing of the programme of archaeological mitigation in the event the Scheme is granted consent.



3. IMPLICATIONS OF THE ARCHAEOLOGICAL FIND FOR THE DEVELOPMENT AND ANY HARM IT MAY CAUSE TO THE WORLD HERITAGE

- 3.1.** The archaeological work of the Stonehenge Hidden Landscapes Project has highlighted the importance of active engagement with an evolving area of research, the relationship between human activity and natural features within the Stonehenge WHS landscape. This phenomenon is far more widespread than the Salisbury Plain and as such relates to wider research frameworks than that associated either just with the Scheme or the World Heritage Site.
- 3.2.** It also proposes a theory relating to a landscape scale approach to monumentalisation by Neolithic and Bronze Age communities.
- 3.3.** Although the published research represents a preliminary view of the results of the surveys and investigations conducted by the project, Historic England considers that the implications of the SHLP research can be drawn on in finalising the detailing of the programme of archaeological mitigation on the Scheme. This would be through its contribution to the development of research questions to test the theories, evidence and assumptions both from the research and the Scheme.
- 3.4.** These research questions will in turn inform the development of the site specific approaches to archaeological mitigation to be implemented in the event the Scheme is granted consent.
- 3.5.** The implications of the research can therefore be targeted in two areas. Firstly in relation to the potential direct impact of the development on the results of the research. Secondly in relation to the potential for other features of a similar nature within the Scheme and crossing the boundary of the DCO itself.
- 3.6.** The proposed circuit of large pits and associated postulated inner ring of pits and/or post holes is located outside of the DCO boundary. It would consequently fall within the same category of heritage assets or features



which would experience a change within their settings, such as the monument at Durrington Walls and the Larkhill Causewayed Enclosure.

3.7. We are satisfied that the evaluation results would have identified any substantial features of the nature discussed in the SHLP report. Should smaller pit or posthole anomalies be discovered during the course of the programme, the DAMS provides for a flexible and iterative approach for their investigation. The specifics of that work will be set out clearly in the SSWSIs with associated site specific research questions that have yet to be developed by the archaeological contractor.

3.8. Since these SSWSIs will be undertaken by the contractor following their active engagement with a series of technical workshops to be attended by members of the Scientific Committee (including one of the lead authors of the report), and the SSWSIs themselves will be consulted on by HMAG prior to approval by Wiltshire Council in consultation with Historic England, we are satisfied that sufficient safeguards have been included within the processes set out under the DAMS, OEMP and progressed elsewhere to ensure that the results of this most will be able to influence the development of the mitigation strategy under the Scheme if consented.



4. IMPLICATIONS FOR THE APPLICANT'S ENVIRONMENTAL STATEMENT, INCLUDING THE HERITAGE IMPACT ASSESSMENT, AND THE PROPOSED DETAILED ARCHAEOLOGICAL MITIGATION STRATEGY

- 4.1.** Historic England's objective through the course of the Examination was to ensure that the historic environment was fully and properly taken into account in the examination and determination of the application and, if consented, that appropriate safeguards were built into the Scheme across the dDCO (draft Development Consent Order), Outline Environmental Management Plan (OEMP) and Detailed Archaeological Mitigation Strategy (DAMS) [AS-111: 1.4].
- 4.2.** At the conclusion of the Examination we confirmed that the concerns we had raised had broadly been addressed. We also broadly concurred with the assessment in the HIA in its application of the ICOMOS 2011 guidelines despite some differences of opinion regarding the effect of individual elements of the Scheme.
- 4.3.** Had this research and its interpretation been available at the time of production of the documentation or during the course of the Examination Historic England consider that it would have been included and taken into account in the assessments produced by the Applicant.
- 4.4.** We consider that the assessments conducted under the Scheme were sufficiently rigorous to inform its determination and development of an appropriate and proportionate archaeological mitigation strategy. The recently published research does not change our view of those assessments.
- 4.5.** The DAMS sets out a process for further development of the site specific research questions, methodological approaches and application of investigative techniques and analysis in the SSWSIs which will allow them to focus on the detail of the archaeological resource in individual areas. The SSWSIs which will flow from and be informed by the DAMS have not yet been developed as it is important that these are compiled by the archaeological contractor who will be responsible for the work.



- 4.6.** In addition they will be informed by collaborative discussion with HMAG and the Scientific Committee. The development of research questions specifically related to the understanding of significance of the use of natural features in the landscape will be an essential component of the SSWSIs.
- 4.7.** The SSWSIs will adopt a multi-technique approach designed to integrate the results of multiple different survey and investigative techniques where these have been demonstrated to have value for archaeological interpretation.
- 4.8.** They will facilitate the adoption of the iterative process outlined in the DAMS to the development of research questions which will encourage individual archaeologists responsible for the excavation of individual features to develop and test their theories in real time as work on the Scheme progresses if consented.
- 4.9.** Historic England therefore considers that processes are already set up in the DAMS to engage with new research and for the continual evolution of the archaeological mitigation throughout the programme for the Scheme. The further development of the archaeological research agenda and production of SS WSIs with site specific research questions, will enable the research questions posed by review of the SHLP report to be taken account of in the programme of archaeological mitigation to be undertaken if the Scheme is consented.

5. CONCLUDING REMARKS

- 5.1.** Due to the specialist nature of this consultation, should the Secretary of State have any additional queries, either in relation to our comments above or the responses from other Interested Parties to the Secretary of State's letter, we would be pleased to continue to offer further assistance.