

Archaeological Information and Advice

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your ref TR010066-000003
my ref AS/Pre-App/CC23_A46 Coventry Junctions (Walsgrave).1

Dear Ms Reeves,

Re: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Highways (the Applicant) for an Order granting Development Consent for the A46 Coventry Junctions (Walsgrave) (the Proposed Development).

Thank you for your consultation on this Scoping Report. Please accept my apologies for the delay in my response.

The following comments are in respect of the archaeological implications of this proposal and are without prejudice to any comments which Historic England or the relevant Conservation Officers may have in respect of any potential impacts on non-archaeological heritage assets which may lay within, or in the wider vicinity of, this proposal.

Comments on Chapter 7: Cultural Heritage of the Scoping Report.

- Para. 7.3.21 of the scoping report references two phases of archaeological work across this area, comprising a geophysical survey and archaeological trial trenching to the south. It further states that ‘In addition to the HER records within the proposed scheme extent, these surveys demonstrates the low potential for previously unknown archaeological remains to survive within the Area’.

I do not agree with this conclusion, and would highlight the following:

- There is too limited baseline data available for this area to come to this conclusion. The study area is relatively small and, as it is in an area which has not been subject to much previous development, the limited number of known sites may reflect the lack of previous intrusive archaeological fieldwork across this area, rather than a lack of archaeological sites (see also comments below in respect of non-intrusive survey). Whilst this chapter highlights that the earliest known archaeological features within the study area date to the medieval period (ridge and furrow), I would highlight that archaeological features pre-dating the medieval period have been previously identified from the wider area, including a possible Roman enclosure visible as a cropmark 400m to the east of this proposal (MWA19114), an as yet undated possible circular enclosure cropmark c.1200m to the south-east, and Roman features recorded during fieldwork c.2100m to the east.

- That the geophysical (magnetometry) survey referred to only identified a limited number of potential archaeological features does not mean that only a limited number of archaeological features survive across this area. The effectiveness of magnetometry survey is dependent on a number of factors such as the types of archaeological features present and the local geology; even in the optimum conditions for this type of survey, it will not identify all types of features. The local geologies and soil types are not optimum for this type of survey, and in our experience, whilst such surveys can and do identify some potential archaeological features, others are frequently missed. Therefore, whilst such survey can be an effective tool for identifying potential archaeological features to target by subsequent evaluative fieldwork, the absence of such features does not mean that they are not present, only that they have not been detected by the survey. I would also note that, as stated earlier in this paragraph, this survey identified ‘potential evidence for sporadic activity of unknown date suggestive of some use, though relatively small scale’. As those potential features have not been further examined, their character and significance has not yet been established. It is therefore premature to suggest these potential features are not significant, as could be read into the conclusion quoted above.

I therefore consider that there is insufficient information available at this time to come to the conclusion that ‘low potential for previously unknown archaeological remains to survive within the Area’ as proposed by this paragraph. I would note, however, that this lack of sufficient baseline data does seem to have to have been taken into account later in this chapter, with it being proposed to undertake further assessment, including geophysical survey and trial trenching, to inform the ES. Given the limited archaeological information currently available from the immediate vicinity of this proposal, I would also recommend that the archaeological information from a wider area than the 300m study area currently proposed be examined during the ES process.

- Table 7.7.1, which sets out the potential impacts on cultural heritage within the proposed scheme extent, should reference potential damage through compaction during and post-construction due to factors such as the storage of materials etc, as well as the compaction caused by the vehicle movements currently referenced.
- Table 7.7.1 references potential changes to the groundwater levels etc having a potential impact, however, para. 7.5.1, which does reference the management of noise and vibration, does not reference any monitoring and management of the groundwater conditions (if appropriate). It should.
- Paragraph 7.6.1 states that ‘none of the impacts are likely to be of a level and character that cannot be reduced, avoided, or mitigated using standard mitigation measures’. It is not clear what ‘standard mitigation measures’ are considered to be in this instance. I would note that, as set out above, there is insufficient baseline information available at this time to enable an adequate assessment to be made of the archaeological potential of this area and any impacts that the proposal may have on any archaeological features present. It cannot, therefore, be ruled out at this stage that there may be archaeological features present which would be worthy of preservation *in situ*, which may not be possible within the constraints of the project as presently proposed.
- Whilst I am pleased to note that paragraph 7.6.4 acknowledges that there is a potential for archaeological features to survive across this area, I consider that, given the limited archaeological information currently available, it is premature to consider that ‘any remains would most likely be of low value’. As there is insufficient information to be able to assess the significance of any archaeological features present, and the impacts that the proposal will have upon these, I also consider that it is premature to conclude that ‘archaeological monitoring in

areas of higher potential would reduce impacts on archaeological remains to result in the neutral (not significant) effect’.

- I note that paragraph 7.2.1 states that a ‘Zone of Theoretical Visibility (ZTV) was not available when undertaking the assessment which has informed this report, and that therefore a 1km study area was determined to be appropriate based on professional judgement. I would recommend that this study area be reassessed once the ZTV is available. The assessment of potential impacts on setting should also take into account potential impacts on the setting of significant non-designated heritage assets, as well as any designated ones which lie within the ZTV.

Comments on Proposed Assessment Methodology

I am pleased to note that Cultural Heritage is to be considered further in the ES (para. 7.6.14), and that paragraph 7.7.1 proposes this including a desk-based assessment (supplemented with sites visits), non-intrusive geophysical survey (magnetometry) and archaeological trial trenching.

I note that some initial background research has been undertaken during the production of this scoping report, which including obtaining information from the relevant Historic Environment Records (HER). I would, however, highlight that, as referenced in paragraph 7.3.2 this background research only included examining any ‘**other readily available online information** sources such as aerial photographs, historic mapping etc [emphasis mine]’. The desk-based assessment undertaken as part of the ES process should also examine any other relevant background material including that held by the relevant Record Offices and other archives, not just that available on-line.

I would also highlight my comments above in respect of the ineffectiveness of geophysical survey at determining the absence of the archaeological features, as whilst that survey will hopefully provide information which will help guide the trial trench locations (i.e. it may identify potential archaeological features which can be targeted by the trenching), the absence of any such features across any part of the proposal site should not be taken to indicate that an area is ‘blank’ and therefore does not warrant trial trenching.

Para. 7.7.3 states that the study area for potential impacts will include ‘the footprint of the proposed scheme plus any land outside that footprint which includes any heritage assets which could be physically affected’. It is not clear whether this includes any areas of temporary works, such as site compounds and temporary access roads where heritage assets have not yet been identified; it should. It should also consider any potential impacts caused by works to mitigate other environmental impacts, for example, areas of planting to screen the works, areas of ecological mitigation etc which may lie outside of the main construction site.

I would be happy to advise further on the scope of the archaeological assessment and the relevant ES chapter on request.

Please do not hesitate to contact me if you have any questions.

Yours sincerely,

Anna Stocks
Senior Historic Environment Officer