

**Highways England Scheme for Junction 9,
M3 – Option 14**

**Comments on reports and proposed mitigation on
Cultural Heritage of South Downs National Park**

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1. Introduction

This report was commissioned by South Downs National Park Authority (hereafter SDNPA) from Regini Heritage Consultants and the work was undertaken by Anne Bone. The brief was to comment on the reports commissioned by Highways England, assess the completeness of the data, to comment upon the report and the mitigations proposed and propose any further mitigations that meet the Purposes and Duty of the SDNPA.

The following reports by Highways England's consultants were supplied by SDNPA:

- Environmental Study Review 1 (hereafter ESR) completed Sept. 2016 at PCF Stage 1- specifically chapter 6 on Cultural Heritage
- Cultural Heritage Desk Based Assessment (hereafter DBA) undertaken Nov. 2017 at PCF Stage 2.

The study area is within Winchester City Council and so the definitive Historic Environment Record is held by that authority and not by the county council, under the arrangements of Urban Archaeology Databases and Strategies supported by Historic England.

This was the first such scheme where the DBA was shared with the SDNPA and this is very useful in assessing the impact on the National Park and also reduces the financial cost to the SDNPA.

2. Comments on data completeness

The nationally recognised heritage asset information is drawn from Historic England's web site and is reliable.

For locally important and non-designated heritage assets the definitive record is the relevant Historic Environment Record. There is an apparent inconsistency in the source of the data for the historic environment between these two reports – the ESR (p26) states that its information is drawn from the Hampshire County Council HER whilst the DBA (p16) refers to the Winchester City HER. In fact, the Winchester City HER is the definitive database for this part of the SDNP. However, the site/monument reference numbers appear to be the same in both reports.

The use of historic map information in the DBA is useful and in line with good practice of the Chartered Institute for Archaeology.

For total accuracy and completeness Highways England should be asked to confirm which HER has been used and which of these two reports is the most definitive statement of their assessment of the potential impact on Cultural Heritage.

Given this caveat the data sources used appear to be sound and reliable.

3. Assessment of cultural heritage in reports

The ESR rightly identified the potential impact on nationally important water meadows and removed the impact by designing a scheme outside of those areas. The DBA is more useful in assessing impact as it considers the setting of heritage assets (specifically excluded from the

PCF Stage 1 ESR) which is key for the SDNPA as a historic environment. There is no consideration of the overall impact on the historic landscape and the SDILCA so this must be included in the landscape reports.

The DBA and ESR both recognise that many of the archaeological assets found in the original construction phase of the M3 are likely to extend into the areas affected by this scheme. This correctly recognises both the linear nature of many of these features (crop-marks, field boundaries) and the intensive usage of the landscape particularly in the prehistoric period. These excavations were undertaken in the 1970's when the time and resources available for archaeology from infrastructure projects was under great pressure. The current government and local policies quoted in both reports should ensure sufficient time and budget for investigations to 21st century standards. Additionally, there have been many new developments in archaeological techniques, especially in analysis of samples and in new dating methodologies, which can now bring a new light on the sites discovered in the 1970s as well as newly recognised sites.

The DBA report (p23) also recognises that there may be sites equivalent to scheduled monuments but which are not currently scheduled. The crop-mark sites of prehistoric activity may well fall into this category and particular attention should be given to preservation by record if redesign of the scheme is not feasible.

The DBA recognises that the archaeological impact is not just within the new/modified route but also includes the impact of heavy plant on haulways etc, the construction of site compounds and the other ancillary works of a major infrastructure scheme. Mitigation may be required in all these areas, depending on the detailed works being proposed and on initial investigations of the surviving archaeological assets.

Neither the ESR or the DBA refer to or appear to be informed by the Solent Thames Research Framework for this area, published in 2014 (by Oxford Archaeology, ed. J Hind and J. Hey) and developed under the guidance of Historic England. This identifies the major questions still to be answered and should inform the development of the mitigation proposals, especially the Written Schemes of Investigation for both initial investigations and later detailed archaeological work.

The DBA's study of setting recognises that the impact of a revised Junction 9 may extend to the registered Park and Garden of Worthy Park and the Conservation Areas of Abbott Worthy, Martyr Worthy and Easton. Neither of these settlements have up to date Conservation Area Appraisals and Management Plans and there is no Conservation Management Plan for Worthy Park. If such documents were in place they would provide an evidence base for the condition of these assets before work on J9 commences and also a baseline for measuring impact after completion of the junction improvements.

4. Assessment of mitigation proposals

The ESR and DBA both contain mitigation proposals of a fairly standard and proficient nature but which do not take account of the particular requirements of a National Park. Mitigation to meet the needs of the Winchester Local Plan are proposed, starting in PCF Stage 3 with geophysics and archaeological monitoring of geotechnical investigations. More detailed archaeological investigations, including excavation, would then follow.

In a National Park the conservation and enhancement of heritage, including archaeology, is an important part of Purpose 1 under the 1949 Act. It is crucial therefore that archaeological investigations are undertaken early enough to inform the medium and final stages of design in PCF 3 onwards. This would allow any nationally important archaeology to be preserved in situ by design solutions at any early enough stage to avoid major budgetary or time implications for Highways England.

Where preservation of archaeology is to be by record and to add to the evidence from the 1970's excavations, the mitigation works should be informed by the Research Framework (see above) and by the scientific advisor of the regional office of Historic England. This will allow sufficient time and budget to be allocated for the best possible archaeological investigation and minimise the loss of evidence. Such work must be planned in advance of construction work as much as possible to facilitate a detailed investigation of the archaeology.

The detailed archaeological investigations will be specified in one or more Written Statement of Investigations. The DBA identifies that this will need to be approved by the local authority archaeologist but the SDNPA also needs to approve this, either through its own resources or through another agent.

There is no mention in the DBA of Purpose 2 of the SDNPA but the engagement of the local community and increasing access to the understanding of the area's cultural heritage are also key issues. With the inclusion of the prehistoric period in the National Curriculum the creation of learning resources for schools drawing on the results of these investigations is also a necessary output for the SDNPA. These should all be agreed with a financial contribution from Highways England (in line with the polluter pays principle), perhaps secured through the Development Control Order procedures.

5. Conclusions

- I. The SDNPA welcomes the inclusion of the Desk Based Assessment in its consideration of cultural heritage aspects of this scheme. In future National Infrastructure schemes the SDNPA wishes that the commissioning body submits its Cultural Heritage Desk Based Assessment to SDNPA in good time for review to allow a more effective and efficient response to be obtained.
- II. That Highways England confirm the sources of Historic Environment data in these two reports and which HER takes precedence in their studies.
- III. That the overall impact on the historic landscape is considered by Highways England, in either this or the landscape aspect of its reports.
- IV. That mitigation of the impact on archaeological assets must be undertaken in accordance with:
 - a. The Solent Thames Research Framework
 - b. The advice of the Scientific Adviser of Historic England South East
 - c. The advice of the Winchester City Archaeologist and other agent of the SDNPA, as advised to Highways England in due course
 - d. Written Schemes of Investigation to be approved by the SDNPA's agent, to be advised to Highways England
 - e. Archaeological works to be programmed as early as possible to allow preservation by record where preservation by design is not feasible
- V. That the evidence for the impact of this scheme on Registered Parks and Gardens and Conservation Areas in the SDNPA and within 1km of the Junction 9 scheme be

captured by Highways England commissioning suitable Conservation Management Plan (for Worthy Park) and Conservation Area Appraisals and Management Plans for Abbots Worthy, Martyr Worthy and Easton.

- VI. That appropriate levels of resource are provided by Highways England through the Development Control Order, if granted, to undertake a programme of engagement, publication and exhibition and learning resources to support the SDNPA in achieving its statutory purposes.

