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27th February 2014

Dear Sirs,

RESPONSE TO HS2 PHASE ONE ENVIRONMENTAL STATEMENT CONSULTATION

INTRODUCTION

This response is made on behalf of the Buckinghamshire Archaeological Society and relates mainly to the potential impact of HS2 on the Cultural Heritage topic of the ES as it relates to Buckinghamshire.

The Buckinghamshire Archaeological Society, founded in 1847, is one of the oldest in the country and is the senior body in the county of Buckinghamshire in archaeology, architecture and local history. We publish *Records of Buckinghamshire*, the principal archaeological and historical publication for Buckinghamshire, as well as books and papers on the county's history and archaeology. We are not anti-HS2 in principle but are concerned to protect Buckinghamshire's historic environment. To this end we have an active project researching the likely impact of HS2 on various heritage sites and buildings in Buckinghamshire. Our reports on the following places are on our website http://www.bucksas.org.uk/hbgprojects/2011_1.html

Twyford:

Chetwode

Potter Row, Great Missenden

Road Farm Barn, Wendover Dean

Doddershall

We have also published a pamphlet on **Stoke Mandeville's deserted village** which has been widely distributed, including to HS2 Limited and its archaeologists, and have carried out survey work on the site.

Our report on **Doddershall Lodge**, due to be demolished as part of Phase One, is in preparation.

We have had two "bilateral" meetings with HS2 Limited's archaeological consultants and have attended meetings of the various HS2 Community Forums for the county. We have responded to all the public consultations on HS2 (except those relating to compensation) but including those on the Scoping and Methodology of the Environmental Statement, the Draft Environmental Statement, Design Refinements and draft Code of Construction Practice.

We realise that the construction of HS2 would bring the opportunity for substantial 'knowledge gain' and it is essential that the HS2 budget includes adequate funding for archaeological investigations and excavations, and building-recording. This should include a programme of community engagement, so that the public can have access to archaeological investigations, as well as timely publication of results for both lay and specialist audiences.

Our Society started the Buckinghamshire County Museum and still owns a significant part of the museum's collection and it is of some concern that there is, as yet, no plan for curation and display of HS2 archaeological finds.

We believe that HS2 Ltd's archaeological contractors have found our contributions useful so far and we would like to continue a dialogue with them and HS2 Ltd. In particular we want to register our interest in being consulted on the emerging Heritage Memorandum and general Written Scheme of Investigation (WSI). Since we have in-depth knowledge of several places affected by HS2 we would like the opportunity to contribute to site specific WSIs. We have close links with Buckinghamshire County Council's archaeologists and have discussed the ES with them and with English Heritage's Inspector of Ancient Monuments.

Below are our general comments followed by our reports/concerns about specific sites. The latter are subject to a proviso that we have had neither the time nor resources to investigate the ES in depth for the whole of Buckinghamshire. Our comments are confined to the Cultural Heritage topic for just some of the places we have researched as part of our HS2 impact-assessment project. Since the historic environment is overarching, other topics within the ES are relevant but we have not been able to study these. We understand that Environmental Impact Assessment is a continuing process so we assume that HS2 Ltd and/or their contractors will welcome further comments as we gain more knowledge about heritage assets impacted by the scheme.

We ask that our comments about the Deserted Medieval Site at Doddershall be dealt with as a matter of some urgency since we fear there has been a lack of liaison between HS2's archaeological contractors and the engineers designing the route resulting in a proposal to (we hope unwittingly) destroy an important heritage site. (see pages 11-15 below)

GENERAL COMMENTS

The Consultation Process

The consultation process has not been easy. The initial inadequate period followed by two extensions resulted in uncertainty and difficulties in planning a response which inevitably involved co-ordinating the efforts of several people in our Society. Our request for free printed copies of the relevant Chapter 5 volumes for our Society's library (which is open to all) was denied (rather ironic since the Cultural Heritage chapters have referenced several of our publications and those written by our members!).

The documentation is unnecessarily complicated and difficult enough for specialists to understand and probably largely incomprehensible to the general public. The need to look at several maps for a particular place meant it was essential to have printed copies. We do not understand why the maps did not have sections showing the profile of the line; such maps were produced during the Community Forum meetings. It is impossible to understand the impact without knowing the height or depth of the line. The profile/sections in the Hybrid Bill documentation bore no relation to the map books and so were meaningless. The use of aerial photographs would have made the information much more comprehensible. For example, one was produced for the Stoke Mandeville Community Forum with the route superimposed. The photo-montages added little or nothing to understanding impact.

We regret the absence of any consultation events. These would have been much more useful than the events held during consultation on the draft ES which gave so little baseline information. Coupled with the suspension of the Community Fora this means there has been no opportunity for public engagement with HS2.

Concern over lack of survey and investigation

Constraints over land access and the extent of ground disturbance associated with proposed HS2 works including construction sites, bunds, road diversions etc., have prevented a full assessment being carried out of HS2's impact on the historic environment. We note that there has been very limited geophysical survey and fieldwalking in several areas and no geophysical survey at all in area CFA 12. A detailed re-assessment of the heritage database should be completed as a matter of urgency and fieldwork, which should include evaluation trenching, should be completed at the earliest opportunity.

Concern over misuse or non-use of Historic Environment Record data

We understand from Buckinghamshire County Council's archaeologists that up to date HER data were supplied by them but appear not to have been used in the ES. We have not made a full assessment of the quality of the heritage data presented for Buckinghamshire, but in passing we noted, for instance, that the zone defining the location and extent of a Roman villa in the Misbourne valley west of Amersham is quite inaccurate in map number CH-01-028. We cannot understand why the County Council's Archaeological Planning Notification Areas have not been utilised. This reinforces the need for a full review of the heritage data on the route.

Pleistocene deposits

Heritage Assets must include Pleistocene deposits where given the potential for human and animal interaction. Three significant locations are known in Buckinghamshire but there is high potential for others where previously undisturbed alluvial deposits exist. These have been scarcely noted in the ES. Steps should be taken to assess them with a view to carrying out detailed advance investigations here and to avoid unexpected discoveries in the course of construction. Discussions should also take place with the British Geological Survey to highlight other scientifically important areas.

Dealing with archaeological finds

It is understood that no adequate provision was made for curation and storage of archaeological material recovered during construction of HS1. A detailed policy statement should be issued explaining what steps are being taken to deal with this issue on HS2 in order to ensure that the intentions expressed in the National Planning Policy Framework Document are met ... 'Copies of evidence should be deposited with the nearest Historic Environment Record and any archives with a local museum or other public depository.' (NPPF Para 41 and footnote 30).

Draft Code of Construction Practice and Draft Heritage Memorandum

The Draft Code of Construction Practice does not seem fully in accord with the Draft Heritage Memorandum. The Draft Code must refer to the Memorandum which should take precedence. In particular it should be clear that a substantial amount of time must be programmed into the land acquisition programme to ensure that advance archaeological investigations can be carried out with adequate time and does not impede the construction programme. The important monitoring and executive role of the Heritage sub-group in this process should be acknowledged since they will continue to meet '...throughout the design and construction period.' (HM para. 4.2.1).

The Draft Heritage Memorandum states that it will dis-apply various legislative provisions. Will it also dis-apply Faculty Jurisdiction in cases where it may otherwise apply?

Human remains at Stoke Mandeville

The Draft Heritage Memorandum Section 8 covers human remains and refers to the development of a Human Remains and Burial Monuments Procedure. We would like the opportunity to comment on this Procedure before it is finalised. In the case of the major disturbance to the site of old Stoke Mandeville church, full archaeological investigation of the entire church site and cemetery (together with a number of other associated features) is definitely required. Scientific examination of an entire village community

probably dating back to the twelfth century and continuing until the late nineteenth, would in particular provide a unique scientific opportunity.

There is no existing consecrated place within the parish where it would be possible to re-inter the estimated absolute minimum of 2,600 burials which would be recovered. Under these exceptional circumstances we believe that, subsequent to archaeological investigation, storage should be locally provided at a new site funded by the HS2 programme. What is required is a purpose-built building close to the village set in a green space; a legacy site which would enable both display of rescued architectural features and grave-markers but also permanent storage of the substantial volume of human remains. The whole would provide some compensation for local feelings in this matter and in the long term enable future study of the remains, given scientific advances in e.g. ancient genetics.

This is a sensitive matter which requires a consensual approach involving the parish council, parochial church council and members of the local community and, we believe the Diocesan Advisory Committee and Cathedral and Church Building Division, both of which have their own archaeologists. A press release by HS2 Ltd on 28th January 2014 stated that "Meetings have been held with Stoke Mandeville parish council and the Buckinghamshire Archaeological Society to talk about the St. Mary's church site." We have no recollection of such a meeting with our Society (except for discussion during Community Forum meetings).

Community engagement and publication

Arrangements should be made at the outset for continuing provision of information about heritage features as they are investigated and efforts should be made to arrange public access to archaeological investigations as they take place. A coherent strategy for both popular and academic publication of results should be declared.

Potential for damage from mitigation measures

Mitigation measures such as bunds, barriers, planting, insulation and anti-vibration measures and the re-positioning of services have the potential to damage heritage significance of sites, landscapes, buildings and their setting. We do not think that sufficient consideration has been given to this aspect and it will be essential for the various HS2 teams to liaise closely to ensure that the scheme's engineering minimises such damage. For example spoil dumps which are meant to provide bunds or landscaped areas will obliterate buried archaeology or landscape features such as ridge and furrow (particularly rare and so more significant in the Chilterns). Historic buildings, often with no or minimal foundations, will be particularly sensitive to harm from vibration and noise either during construction or operation and it will often be difficult or impossible to install insulation measures which would otherwise be appropriate for modern buildings.

SPECIFIC COMMENTS

COMMUNITY FORUM AREA 8: COLNE VALLEY

We have not studied this area as part of our project but are obviously concerned that it should be subject to the highest level of archaeological investigation in view of its significance, especially for the pre-historic period. It is somewhat disappointing to note the lack of survey work so far.

As to impact this CFA, we are conscious that the already severe impact from construction works will be prolonged should the Heathrow Spur be built. Since that would be part of Phase 2 the ES has not dealt with that aspect.

We do feel that the importance of modern influences such as the film industry has not been fully recognised in the baseline. Denham was chosen not only because it was conveniently placed for London

but also because of the availability of picturesque rural locations; Denham village in particular has been seen in countless films and adverts.

Whilst we have not been through the Gazetteer in detail we disagree with elements of the description of Denham Place. It lies north-west (not north-east) of the village. Admittedly its history is rather confusing since a house on the site of the present Denham Court was originally called Denham Place. It is hardly correct to say it is now largely surrounded by modern settlement. The “claire voie” on the western side is a significant historic feature deliberately maintained to give views over the fields on the other side of Denham Avenue.

The Denham Conservation Area (CVA013) does not include undesignated heritage asset buildings on map CH-01-023-L1. These could be identified from South Bucks DC’s Conservation Area Character Appraisal. http://www.southbucks.gov.uk/environment_planning/historic_environment_building_conservation/conservation_areas/denham_map.aspx

As to setting we would point out that the tower of St. Mary’s church is clearly visible from the Chiltern Line, as are the trees at Denham Place.

COMMUNITY FORUM AREA 9: CENTRAL CHILTERN

We believe there has been insufficient realisation of the significance of the unique historic landscape character attributable to the Chilterns AONB. The County and Chilterns Historic Landscape Characterisations appear not to have been utilised. We find the extent of damage to this area unacceptable and, as we pointed out in our reply to the draft ES, it could be avoided by a full Chilterns Tunnel emerging north of Wendover.

POTTER ROW

HS2 references: Area CFA9 – Zone ASZ16 and Unique ID CC077

Summary:

In our view the assessment that the impact of HS2 construction on the archaeologically important Potter Row as ‘low’ and ‘slight’ is based on statistical misdirection and lack of the intended survey evidence. As a matter of priority:

- the intended geophysical survey should be carried out, and
- until surveyed the impact level on the site should be considered as anywhere between ‘low’ and ‘high’.

Assessment:

The archaeological significance of Potter Row is recognised in the Environmental Statement (see for example Appendix CH-001-009 paragraphs 3.6.16, 3.7.10 and 8.1.15) and its long period of settlement and industrial activity stretching from the Neolithic to the post-medieval periods (Appendix CH-002-009 page 30 item CC076). Potter Row is an Archaeological Notification Area designated by Buckinghamshire County Council.

The extent of the archaeologically significant area and its proximity to the HS2 route is noted:

‘Potter Row lies on the eastern edge of the route and represents a possible extensive medieval and post-medieval focus of pottery production. The area includes land around the Grade II listed buildings at Bury Farm (CC070) associated with non-designated medieval and post-medieval archaeological remains (CC066). It also includes the ancient woodland of Jenkin’s Wood (CC073), where further archaeological remains have

been found, and extends northwards to Hammondshall Farm (CC094).’ (Appendix CH-003-009 page 14 item CC077)

The likelihood of as yet undiscovered archaeology is also recognised: ‘There is a strong potential for further *in situ* and unstratified ceramic and metal artefacts and associated below ground features.’ (Appendix CH-001-009 page 59 item 16).

Although Potter Row is undesignated, its Heritage Value is recognised as ‘High’ (Appendix CH-003-009 page 14 item CC077).

However the impact of HS2 construction on Potter Row is seriously underestimated as a result of a statistical misdirection.

The Impact Assessment Table defines the impact of construction as ‘Low adverse’ and its effect as ‘Moderate adverse’. The justification given for this low assessment is that ‘...construction works will affect approximately five per cent of an area of earthwork and buried archaeological remains ... This will result in a slight impact on the asset...’ (Appendix CH-003-009 page 14 item CC077)

The implication here is that because construction will leave 95 per cent of the area unaffected the impact is therefore ‘slight’. This is a misuse of statistics.

There is no evidence that potential archaeological finds and features at Potter Row are spread evenly over the area concerned. Indeed if they were this would be a unique and exceptional site. Past excavation evidence everywhere shows that settlement and industrial features are usually concentrated in a relatively small area.

It is therefore equally possible that the five per cent of the area of Potter Row that will be destroyed by HS2 construction work might contain 95 per cent of the archaeology.

Our concern is strengthened by the lack of a survey of the affected area. The Environmental Statement says that ‘additional locations ... were proposed for geophysical survey but due to access or other restrictions these surveys were not carried out.’ One of the four unsurveyed locations listed is ‘Potter Row, Hyde Heath (CC077, national grid reference SP 90354 02046).

In our view the assessment that the impact of HS2 construction on the archaeologically important Potter Row is ‘low’ and ‘slight’ is based on statistical misdirection and lack of the intended survey evidence. As a matter of priority:

- the intended geophysical survey should be carried out as soon as possible, and
- in the meantime the impact level should be considered as potentially ‘high’.

ANCIENT CHILTERN WOODLANDS

HS2 references: Area CFA9 - Unique IDs CC019, CC030, CC050, CC109

Summary:

With few exceptions, Chiltern woodlands contain archaeological remains that are key evidence for human settlement over a long period from prehistory to medieval times. For this reason the 8.8 hectares of Sibley’s Coppice, Mantle’s Wood and Farthing’s Wood that are to be destroyed by HS2, as well as the identifiable earthworks in Mantle’s Wood, must be given the highest level of professional archaeological investigation and excavation before HS2 construction begins.

Assessment:

The construction of HS2 across the central Chilterns requires the removal of sections of three ‘ancient woodlands’. These are listed in the ES Gazetteer as:

Woodland	ES Unique ID	Area to be taken
Sibley’s Coppice	CC050	2.1 hectares plus road widening
Mantle’s Wood	CC019	6.2 hectares
Farthing’s Wood	CC030	0.5 hectare

The work will also affect Mantle’s Wood Earthworks (CC109).

All three areas are described in the ES Gazetteer as ‘Ancient and semi-natural [or ‘replanted’] woodland’. They are ‘a surviving remnant of more extensive forest as part of the mosaic of other stands of surviving ancient woodland in the surrounding landscape’, whose ‘value lies in its potential for well preserved archaeological remains of woodland management and industries typical of woodland such as wood banks, saw pits, quarries and small settlements. They can also preserve features of earlier periods.’ (Appendix CH-002-009 page 18 item CC050)

Within Mantle’s Wood are earthworks indicating possible below-ground archaeological remains connected with the medieval Mantell’s manor, held at the time of Domesday Book (1086) by Turstin Mantel. (Appendix CH-002-009 page 8 items CC018 and CC019)

The Environmental Statement concludes that Mantle’s Wood is one of three areas with ‘the highest potential for surviving buried archaeological remains’, while noting that ‘There is a similar potential at Sibley’s Coppice and Farthing’s Wood...’ (Appendix CH-001-009 page 62 paragraphs 8.1.15 and 8.1.13)

Recent research* has shown that Chiltern woodlands contain rich but often unrecognised archaeological evidence of human settlement over a very long period, from prehistory right up to the early 20th century. There are two reasons for this.

First, parts of the Chilterns cleared by the Iron Age reverted to woodland after the Roman period. And it is in these remaining areas of ‘ancient woodland’, uncleared and uncultivated since, that the archaeology of these earliest settlements remains longest undisturbed. In places they preserve prehistoric field systems that have been destroyed elsewhere by later cultivation.

Second, in the later medieval period the conjunction of plentiful wood and timber with the natural resources of clay and chalk led to a woodland economy that lasted in some places into the early 20th century. Chiltern woodlands therefore also preserve a second archaeology of woodland management and woodland industries.

Recent surveys have shown** that just about all Chiltern woodlands contain archaeology. Sibley’s Coppice, Mantle’s Wood and Farthing’s Wood will be no exceptions.

The ES Impact Assessment for all four of these sites – three woodlands and one earthworks – gives them a high value, but records the impact of HS2 construction as ‘Medium adverse’ and its effect as ‘Major adverse’. All four sites will be destroyed. (Appendix CH-003-009 pages 4, 6, 10 and 18)

In our view

The 8.8 hectares of Sibley’s Coppice, Mantle’s Wood and Farthing’s Wood that are to be destroyed, as well as the identifiable earthworks in Mantle’s Wood, must be given the highest level of professional

archaeological investigation and excavation before HS2 construction begins. An adequate record of woodland flora and fauna, will we assume be made (we have not studied the Ecology topic of the ES). Of course, early map evidence will be useful in recording historic hedgerows.

[NOTES for Ancient Chiltern Woodlands comments:-

* See for example John Morris, *The Cultural Heritage of Chiltern Woods* (Chiltern Landscape Project, Chinnor 2009) and David Green and Sandy Kidd, *The Making of the Chiltern Landscape: the Chilterns Historic Landscape Characterisation Project* (Chiltern Conservation Board, Buckinghamshire County Council and the National Trust, 2010).

** See Wainwright, Marshall and Salkeld, *An Archaeological Survey of the Ashridge Estate* (National Trust 2010) and Gary Marshall, *Survey report on Park Wood, Bradenham* (forthcoming).]

COMMUNITY FORUM AREA 10: DUNSMORE, WENDOVER AND HALTON

We repeat that we believe there has been insufficient realisation of the significance of the unique historic landscape character attributable to the Chilterns AONB. The County and Chilterns Historic Landscape Characterisations appear not to have been utilised. We find the extent of damage to this area unacceptable and, as we pointed out in our reply to the draft ES, it could be avoided by a full Chilterns Tunnel.

GRIM'S DITCH

HS2 references: Area CFA10 - Unique ID DWH008

Summary:

The destruction of a Scheduled Monument is most regrettable and could be avoided by the construction of a full Chiltern tunnel but as things stand we assume that Grim's Ditch itself will be excavated to the highest standard. We are seriously concerned with the totality of the context of this somewhat mysterious earthwork and how this reflects the history of land use and settlement across almost 3,000 years of history. For this reason:

- excavation to the highest professional standard is essential not just for the earthworks of Grim's Ditch itself, but also along the length and breadth of the 350 metres of its former line across the area designated to be a major HS2 spoil heap, and
- this investigation must also include analysis of the historically important hedgerows that border the Ditch.

Assessment:

The Environmental Statement (ES) recognises Grim's Ditch as 'the most substantial land boundary in the Chiltern District', noting that 'dating the monument is difficult, although it may have an origin in the 1st millennium BC.' (Appendix CH-001-010 page 11 paragraph 3.3.12) The numerous surviving sections of Grim's Ditch stretch for 18km.

The construction of HS2 will destroy roughly one-third of a 350-metre section of Grim's Ditch at Cottage Farm, one mile due north of Great Missenden, where the rail line cuts through the monument. (see map number CT-06-034a)

The ES recognises this section's archaeological importance, saying it 'survives well as a visible earthwork along most of its length and provides an insight into the nature of territorial land division in the Chiltern Hills. It will contain archaeological evidence for the manner of its construction as well as environmental evidence of the landscape in which it was built. The archaeological evidence may include artefacts or scientific dating material from which to determine the period of its construction and the duration of its

maintenance as an active boundary.’ This summary concludes that the earthwork is ‘of considerable importance for the analysis of settlement and land use in the Bronze Age and Iron Age’. (Appendix CH-001-010 page 11 paragraphs 3.3.32 and 3.3.33, and Appendix CH-002-010 page 4 item DWH008).

The ES Gazetteer adds that the setting of this section of Grim’s Ditch ‘lies ... on the eastern slope of the Misbourne Valley, an agricultural landscape which is not likely to have changed notably through history. Its setting makes a contribution to its value.’ (Appendix CH-002-010 page 4 item DWH008).

So it is not surprising that the Heritage Value of this section of Grim’s Ditch is rated as ‘High’. (Appendix CH-002-010 page 4 item DWH008)

The HS2 rail line will be in a cutting where it crosses Grim’s Ditch (map CT-06-034a). About 150 metres of the monument will be completely removed. The ES impact assessment states that this section will be ‘totally altered and the setting comprehensively changed’. The impact of construction is defined as ‘Permanent High Adverse’ and the Effect ‘Permanent Major Adverse’. These are the highest ratings possible. (Appendix CH-003-010 pages 2-3 item DWH008)

Strangely, the removal of the ‘historically important hedgerows’ which border this section of Grim’s Ditch are classified as only ‘Medium’ impact and ‘Moderate’ effect. Nor, though their removal will be just as complete and irreplaceable as that of the Ditch, are the impact and effect result considered ‘Permanent’. (Appendix CH-002-010 page 2 items DWH001 to DWH005)

Another omission from the ES is to the north-east of the rail cutting, where the line of Grim’s Ditch continues across fields to the north-east until it joins a further surviving section of earthworks. Here any original ditch and bank has been ploughed over, and any survivals will be below ground. As part of the construction of HS2 about 350 metres of the former Ditch will be covered by part of a huge spoil dump (see map number CT-06-034a).

It is currently impossible to know just how far below the ploughsoil remains from this former section of Grim’s Ditch might be. What is certain, however, is that the heavy machinery necessary to construct and manage such a spoil heap will totally destroy any archaeological remains to a much greater depth than any plough.

Our concern:

Of course we would prefer Grim’s Ditch to remain untouched by HS2. Beyond that our concern is less with the treatment of Grim’s Ditch itself – because we assume that as a Scheduled Ancient Monument it must be professionally excavated to the highest standard – and more with its total context. Not just the visible Ditch itself, but its bordering hedgerows and its continuing line across fields to the north-east.

The significance of Grim’s Ditch is twofold: first in the way its initial construction reflected ‘the territorial land divisions in the Chilterns’ in the first millennium BC, and secondly in its effect on the surrounding landscape, agriculture and settlement over almost 3000 years of history.

For this reason:

- excavation to the highest professional standard is essential not just for the earthworks of Grim’s Ditch itself, but also along the length and breadth of the 350 metres of its former line across the area designated to be a spoil heap, and
- this investigation must also include analysis of the historically important hedgerows that border the Ditch.

COMMUNITY FORUM AREA 11: STOKE MANDEVILLE AND AYLESBURY

STOKE MANDEVILLE DESERTED VILLAGE AND CHURCH SITE

HS2 references: Area CFA11 - Unique ID SMA003

Summary:

We would obviously prefer that HS2 avoided this historically important site altogether (as in the original 2011 route), but in the absence of this solution we welcome the High heritage value that the ES has placed on all elements of the deserted village site and the recognition that HS2 will have the most serious impact.

It is our view

- that this rating must ensure the fullest professional archaeological excavation of the whole site, well before any construction work begins;
- that the budget for HS2 should include funded provision for the long-term storage and archiving of all finds and documentation resulting from this excavation;
- that special provision should be made for the human remains from the old churchyard in a new building purpose-built, permanent and local to Stoke Mandeville. (see page 4 above)

Assessment:

The ES recognises the historic significance of Stoke Mandeville deserted village site and the ruins of St Mary's Church and gives a good outline of their known history (Appendix CH-001-011 page 20 paragraphs 3.9.1 to 3.9.9). This summary also suggests that the village may be 'an example of a Saxon settlement that developed close to an established Romano-British estate focus' (Appendix CH-001-011 page 13 paragraph 3.5.7)

The ES rates the heritage value of the site as a whole as 'High', stating that: 'The principal attribution of high value to the site of the former church ... and the likely associated leats and earthworks lies in its buried archaeological resource. ... An essential facet of this asset's value is its potential origin as an important Episcopal manor associated with the Saxon Bishopric of Dorchester-on-Thames. ...'

'The buried archaeological resource of this asset includes the buried remains of a church dating to at least the 12th century and an associated burial ground. It is likely that the buried remains of a former medieval manor house and features associated with an Episcopal desmesne and watermill noted in Domesday are also present, along with buried features associated with any surrounding settlement and agricultural system(s). These remains could date to at least the mid-Saxon period and possibly as far back as the 7th century AD.' (Appendix CH-001-011 page 20 paragraphs 3.9.2 to 3.9.4)

The surveys done for the ES have already enhanced our understanding of the site: 'LIDAR imaging indicates the presence of two or three platforms adjacent to the eastern leat to the south-east of the church enclosure. A third platform appears to be present at the junction of the two leats near Mill House Farm (SMA095). These may indicate the former location of buildings (such as mills)...' (Appendix CH-001-011 pages 21-22 paragraph 3.9.13)

Construction work for the HS2 rail line will completely destroy the deserted village site, including the church ruins and burial ground.

The site today is shown on the Location map (CH-004-11.09B), where the centre of the site is marked as 'Field 1', and on the Remote Sensing Survey Interpretation map (CH-004-11.02), where the church ruins are marked 'K04'. In contrast, its obliteration by construction work for the HS2 rail line and its accompanying maintenance loop is shown by the Construction Phase maps (CT-05-040b and CT-05-41).

Ironically, the 'Site of Church of St Mary' is arrowed on both of the 'Proposed Scheme' maps for the area (CT-06-40b and CT-06-41). Its outline can just be discerned, overridden by the four-track rail line.

The ES impact assessment therefore correctly rates the impact of HS2 construction on remains of the church, its burial ground, the deserted settlement and any mills as 'High adverse' with the effect as 'Major adverse' – the maximum possible. It is strange, though, that it suggests that the 'archaeological remains ... will be removed ... temporarily or permanently'. This is hardly going to be temporary!

Conclusion

It would be best if this high-speed rail line avoided this historically and archaeologically significant site altogether. In the absence of such an ideal solution however, we welcome the 'High' heritage value that the ES has placed on the site, the inclusion of all its elements in this valuation (church, settlement, leats, mills and fields), and the recognition that the construction of HS2 will have the most serious impact.

It is our view

- that this rating must ensure the fullest professional archaeological investigation and excavation of all elements of this deserted village site, starting well before any construction work begins in order to ensure its completion;
- that provision should be made within the budget for HS2 for the long-term storage and archiving of all finds and documentation resulting from this investigation and excavation;
- that special provision should be made for the exhumed human remains from the estimated 2,600 burials in the old churchyard in a new building purpose-built, permanent and local to Stoke Mandeville – again funded from the HS2 budget. (see page 4)

HARTWELL HOUSE & DESIGNED LANDSCAPE

We have not assessed the likely impact but have discussed the matter with the National Trust and clearly share their concerns. We hope that an appropriate solution can be agreed to reduce the impact on this highly significant landscape and building.

FLEET MARSTON

Whilst our Society has not researched the site of the un-named small Romano-British town we welcome the geophysical survey and field walking here. We consider that a more inclusive research assessment should be carried out of what is known of the town, as there has been substantial metal detector activity. It should be stressed that for a period this settlement may have been more important than Aylesbury (ref.Farley and Jones, 2012)

COMMUNITY FORUM AREA 12: WADDESDON AND QUANTON

DODDERSHALL DESERTED MEDIEVAL VILLAGE SITE

HS2 references: Area CFA12 - Unique ID WAD063

Summary:

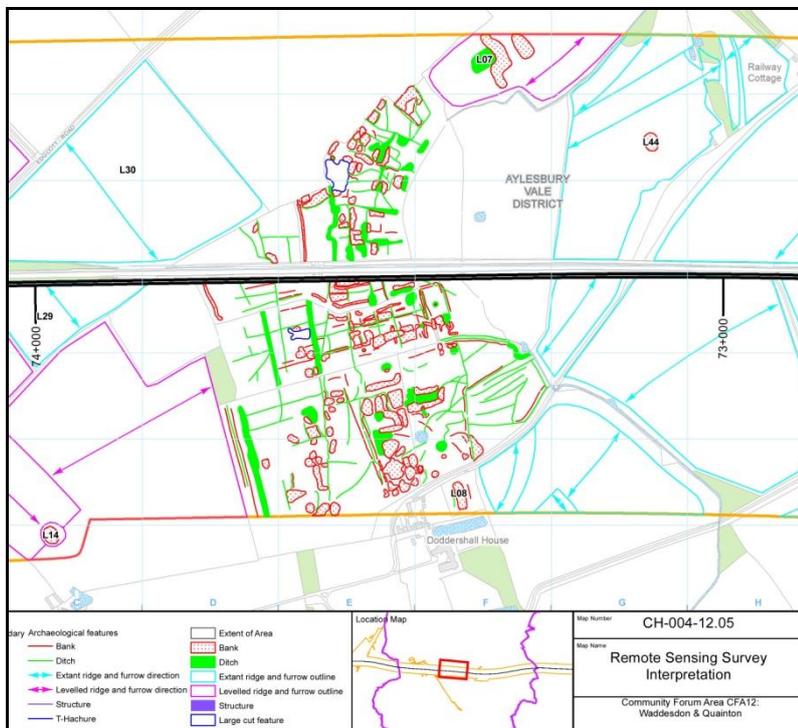
In our view this is a site which could have been considered for scheduling. The site of the deserted medieval village, although correctly identified by the Environmental Statement Cultural Heritage Survey (see Appendix volume 5 map CH-004-12.05), appears to have remained either unnoticed or misplaced by the Construction and Mitigation planning process (see CFA12 volume 2 maps CT-05-051 'Construction Phase' and CT-06-051 'Proposed Scheme'). This may lead to the deserted village site's almost complete destruction. Even low-level intrusion on this archaeological site, rated as of 'High' heritage value, can cause irreversible damage.

This is a serious error which needs immediate correction:

- The Construction Phase and Proposed Scheme maps must be corrected immediately in order to show the full extent of the deserted village site, so that construction plans may be altered before they become irreversible.
- The majority of the deserted village site, which is not needed for the HS2 line itself, should be protected from construction work of any kind, including any temporary use for material stockpiles.
- Where the HS2 line itself crosses the medieval village site and its destruction is unavoidable, the site should be subjected to a full professional archaeological survey and excavation before any construction work begins.

Assessment:

The major remains of Doddershall’s medieval village are spread across open fields to the north-east of Doddershall House (WAD066). They are shown clearly on the ES Remote Sensing Survey Interpretation map (Appendix volume 5 map CH-004-12.05): a kilometre-square network of earthbanks and ditches to the south-west of the HS2 centre-line with a further section 1km x 250m curving away to the north-east on the other side of the line (see Figure 1 below.)



*FIGURE 1:
A section of the ES Remote Sensing Survey Interpretation map showing the deserted village. Earthbanks are displayed in red, ditches in green. (Appendix volume 5 map CH-004-12.05)*

The ES Cultural Heritage Baseline Report is unequivocal: ‘The earthworks at Doddershall are considered to be a heritage asset of high value as an extant example of medieval settlement. ... Doddershall deserted medieval village has a historical relationship with the nearby Doddershall House and has a well-established date of abandonment, enhancing its value.’ (Appendix CH-001-012 page 18 paragraph 3.9.4)

The route of HS2 will cut through the centre of the deserted village earthworks, causing the destruction of a section 1km long by about 100 metres wide (see CFA12 volume 2 map CT-05-051). The ES Impact Assessment defines this impact as ‘High Adverse’ and its effect as ‘Major adverse’ (Appendix CH-003-012 page 10 item WAD063)

In an extraordinary omission, however, the accompanying Construction Phase and Proposed Scheme maps (CFA12 volume 2 maps CT-05-051 and CT-06-051) appear to misplace the deserted village site. The extent of the deserted village earthworks is marked on neither map, while the descriptive caption to Doddershall

House reads ‘Doddershall House and Doddershall Deserted Medieval Village’ – implying that the deserted village site is confined to the area immediately around the house.

On the Construction Phase map (CT-05-051) the actual site of the deserted village is shown as empty fields (see Figure 2 below.)

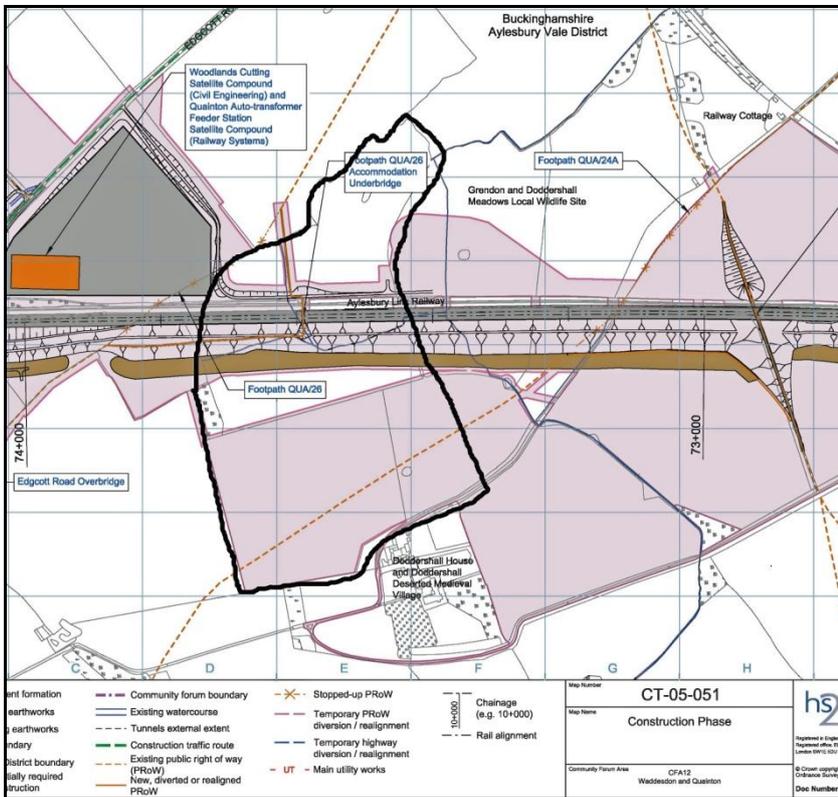


FIGURE 2:
The same section on the HS2 Construction Phase map with the deserted village erroneously marked in the grounds of Doddershall House. The areas shown in pink are ‘required for construction’ of HS2. The black outline has been added to the map to show the actual position of the village earthworks.
 (CFA12 volume 2 map CT-05-051)

Most likely as a result of this omission, the deserted village site appears to have been afforded no protection at all during the construction work for the HS2 line.

Because the possible Civil War Earthworks only 700 metres to the south-east, though rated as of only ‘Moderate value’, have been excluded from the land required, we assume that this treatment of Doddershall deserted village site is erroneous rather than intentional. But it is a serious error which needs to be corrected immediately, before construction plans become irreversible.

The Construction Phase map (see Figure 2) shows the majority of the deserted village site marked as ‘Land potentially required during construction’, with an 80-metre-wide strip bordering the line itself marked for Landscape earthworks and a Temporary material stockpile. To the north-east of the line further strips of the site will be taken by a new inserted access road and the diversion of Footpath QUA/26.

It is not clear for what purpose most of this area is required, but any movement by heavy vehicles will destroy the earthworks of the deserted village – and this is the certain result of the construction of a ‘bund’, the management of stockpiled materials, and the building of an access road.

The Proposed Scheme map (CT-06-051 – see the relevant section in Figure 3 below) shows how this damage will be compounded by planned landscaping works after construction. The large area of the deserted village to the south-west is to be recreated as ‘Grassland habitat’ with a large 100m x 50m ‘Land drainage’ pond. To the north-east the access road and diverted footpath will be bordered by the creation of a ‘Hedgerow habitat’ and a 50m x 120m ‘Balancing pond’ is to be excavated.

None of this land use is compatible with a heritage asset whose value has been defined as High. All of these activities will destroy further sections of the deserted village earthworks.

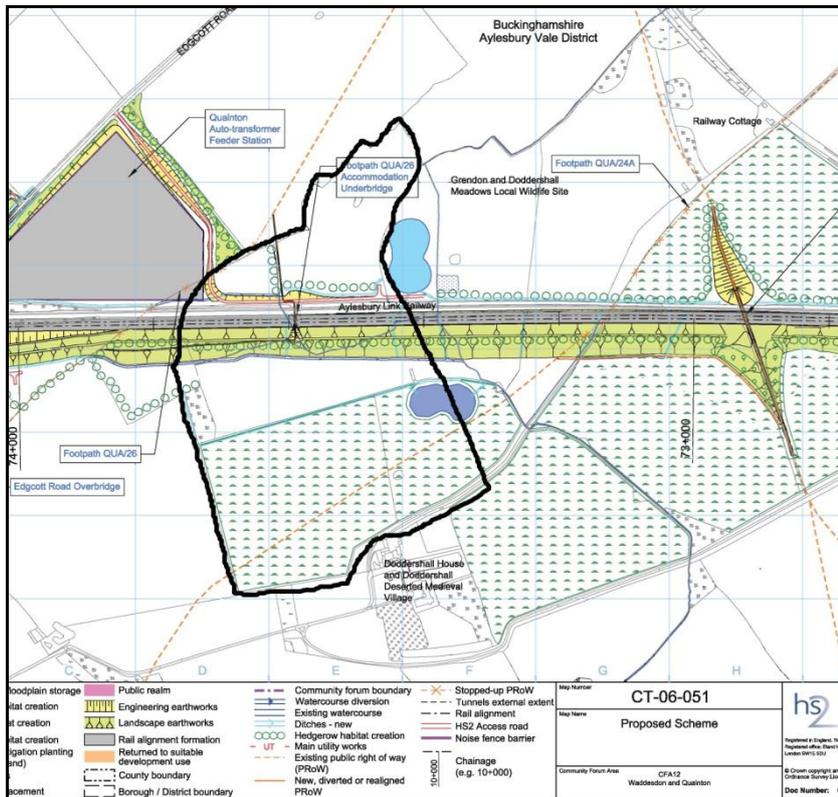


FIGURE 3:
The same area on the HS2 Proposed Scheme showing the re-creation of 'Grassland habitat' across most of the deserted village site, the excavation of two large ponds and addition of an access road, path redirection and hedgerows. Again the village earthworks (outlined) are not shown.
 (CFA12 volume 2 map CT-06-051)

Conclusion:

As a matter of urgency:

- the Construction Phase and Proposed Scheme maps (CT-05-051 and CT-06-051) should be amended to display the correct position and extent of the deserted village earthworks.

Also as a matter of urgency we propose that in view of the high value of Doddershall deserted village as a historic asset,

- only the minimum strip necessary for the HS2 line itself should be taken from the deserted village earthworks;
- all areas of the village earthworks to be removed by HS2 should be subjected to a full professional survey and excavation before any construction work begins;
- the earthworks on both sides of the line should be set aside as a protected area to be kept free from all construction and related works;
- the Land drainage pond should be moved 100 metres to the south-east to take it outside the area of the deserted village and to avoid damage to the earthworks during its construction;
- the Temporary materials stockpile should be removed where it would overlay the deserted village earthworks;
- the Balancing Pond should be moved 100 metres to the south-east to avoid damage to the village earthworks during its construction
- the diversion of Footpath QUA/26 and its Accommodation Underbridge should be moved 135 metres to the north-west so that this does not cross the village earthworks.

Consideration should also be given to

- whether the new access road along the north-east side of the line might be shortened to avoid its crossing the village earthworks,
- whether the 'bund' might be replaced by a narrower form of noise-barrier where it crosses the village earthworks in order to minimise the area destroyed.

These changes will

- render the 'Grassland habitat creation' unnecessary in the deserted-village area to the north-east of Doddershall House,
- remove the necessity for Hedgerow habitat creation on earthworks to the north-east of the line.

DODDERSHALL, POSSIBLE CIVIL WAR EARTHWORK

HS2 references: Area CFA12 - Unique ID WAD050

Summary:

Although we welcome the fact that the site of the civil war earthwork (WAD050) has been excluded from the land required during construction of HS2, we are concerned that the earthwork and any associated buried features nearby will be endangered by the use of heavy machinery working nearby (see map CT-05-050).

In our view:

- Before construction starts, geophysical surveys should be made in the fields around the earthwork,
- A protective exclusion zone of at least 6 metres should be set around all four sides of the earthwork,
- The Temporary materials stockpile shown should be removed to a distance of at least 20 metres.

Assessment:

Due to lack of access to the Doddershall estate surveyors on behalf of HS2 were unable to inspect the earthworks directly. However the Environmental Statement accepts the summary conclusions of the Society's own report on the earthworks: that this may have been a medieval moated homestead, civil-war gun emplacement, or both, with the moated site re-used as a gun emplacement. (Appendix CH-001-012 pages 15-16 paragraphs 3.6.15-16 and 3.7.3, referencing BAS Report 2012-04)

The earthworks' value, however, is rated only as 'Moderate' (Appendix CH-002-012 page 8 item WAD050) presumably because of their uncertain provenance.

The ES Construction Phase map (CH-05-050) indicates that the earthworks have been excluded from the land required from construction. We welcome this exclusion, which we assume is why the impact of HS2 on the earthworks is rated as only 'Minor adverse' and its effect as 'Minimal adverse' (Appendix CH-003-012 page 8 item WAD050).

The ES notes, however, that 'there is potential for associated earthworks or features to extend into the land required' for HS2. The Construction Phase map (CH-05-050) shows that the 'land required' is drawn very close to the earthworks and a Temporary materials stockpile appears to overlap their eastern corner.

We are concerned, therefore, that the earthworks may be in danger of damage from the too-close use of heavy machinery to move construction materials.

In our view:

- during construction a protective exclusion zone at least 6 metres wide should be set around the earthworks to prevent damage from the use of heavy machinery,

- before construction begins, geophysical surveys should be carried out to determine whether associated earthworks or other archaeological features exist below-ground in the surrounding fields, with the option of increasing the protected area if results indicate this is necessary,
- the Temporary materials stockpile should be removed from the area between the earthworks and the HS2 rail line, to a distance of at least 20 metres.

COMMUNITY FORUM AREA 13: CALVERT, STEEPLE CLAYDON, TWYFORD & CHETWODE

Where heritage asset buildings are to be demolished we assume that consideration will be given to relocation, where appropriate, and that there will be the highest level of recording. The documentation so far is not clear on this.

We studied **Chetwode** and **Twyford** as part of our HS2 impact project. Our reports, which were written before the route changes announced after the 2011 consultation, are available on our website and in the HER. We are pleased to note that the line will now be further away from Twyford village and Portway farm but we are concerned that the ES underestimates the value of, and impact on, the setting of heritage assets. Twyford is somewhat isolated with little traffic. The village streets away from Portway and Bicester Road are cul-de-sacs and tranquillity is an important characteristic of this rural settlement.

Mitigation measures such as bunds and planting are likely to destroy archaeological features. Archaeological investigations should be programmed-in well before construction.

We note that no undesignated heritage assets have been identified within the boundary of Twyford settlement. From our research we think it highly unlikely that there are no other heritage asset buildings in the village. We refer to our report *Twyford Village* (July 2011) on our website <http://www.bucksas.org.uk/hbgprojects/hs2twyfordoldcottages.pdf>

At **Portway Farm** (CAL 043) we concluded that one of the barns was of listable quality. As was characteristic of farms of that date, Portway was set away from the village in the midst of its fields. Portway remains a working farm whose land will be divided by the HS2 line. In the circumstances we believe its setting is integral to its heritage value and so do not agree with the statement in the gazetteer that its setting does not contribute to its value. The farm will surely be impacted by the operation of the line as well as during construction.

St Mary's House (CAL 056) was also studied by our Society and again the report is on our website and in the HER. We believe that an application to upgrade the building to II* would be justified. Inevitably, there will be a sound impact and there must be fears of vibration effects with a timber-framed building of this age. The construction and final operation impacts are assessed in the ES as being moderate or medium, but this seems optimistic. Whilst creation of bunds may decrease the noise impact, concerns remain over potential vibration effects. The tranquil setting of the house on the edge of the village at the end of a cul-de-sac is one of its key characteristics.

St Mary's Church (CAL 057) is next to St. Mary's House, the former rectory, and to describe its setting as only "relatively peaceful" is, we believe, an understatement.

Earthworks south of Three Bridge Mill (CAL 125) appear to be a site scheduled as land required during construction and for eventual floodplain storage. What these plans actually entail is not clear, but there is potentially a threat of destruction or damage to the earthworks. Clarity is required.

Chetwode Historic Landscape Component (CAL127). The Cultural Heritage Impact Assessment Tables state: "Although the proposed scheme will extend through the historic landscape component, it will follow

the course of a disused railway line. The landscape will be coherent and intelligible and the key elements of the medieval buildings and earthworks will not be affected.” The construction impact is described as medium adverse and the final operation impact as neutral. We do not understand these conclusions. The line of the HS2 track does not coincide with the old railway track, but is from 250 metres and diminishing to 50 metres further north west and nearer to the village of Chetwode. The old rail track was at the bottom of a cutting. The HS2 track, though designed to be in a cutting, will have a substantial bund between the track and the village. Beyond the bund is a series of temporary material stockpiles during the construction phase. The old railway cutting is approximately 600 metres from Chetwode Priory Church; the edge of the proposed bunds is 300 metres away from the Priory, and will stand above the level of the arable fields by several metres. We believe therefore that there must be a substantial difference in visual, as well as sound, impact (subject to mitigation by bunding).

IN CONCLUSION

The Buckinghamshire Archaeological Society is not opposed to the planned HS2 high-speed rail line in principle, but we are seriously concerned to protect our county’s historic environment. The responses made here, both general and specific, are the result of detailed research by members of the society who have an essential combination of and historical and archaeological expertise and local knowledge. We therefore ask that these responses should be attended to in detail, not just set aside as part of a statistical summary.

In particular we are ask that our detailed response concerning the Doddershall deserted village site (WAD063 – see above) be dealt with as a matter of urgency because we fear there has been a lack of liaison between HS2’s archaeological contractors and the engineers designing the route resulting in a proposal to (we hope unwittingly) destroy this important heritage site.

During the past 18 months the society has passed its detailed research contributions to the archaeological contractors working for HS2 Limited and we believe they have found these useful and informative. We would like to continue a dialogue with them and with HS2 Ltd. The above responses are made in that spirit.

In particular we wish to register our interest in being consulted on the emerging Heritage Memorandum and general Written Scheme of Investigation (WSI). Our members’ in-depth knowledge of sites in Buckinghamshire affected by HS2 would, we believe, enable us to make positive and necessary contributions to site-specific WSIs. Likewise with the essential matters of community engagement in HS2 archaeology, the publication of results, and the storage, curation and display of finds.

We ask for a response to our submissions from HS2 Limited in the spirit in which they have been made.

Yours faithfully



Peter Marsden
Chair of Council
Buckinghamshire Archaeological Society

With contributions from Dr Richard Gem (President), Michael Farley (Vice President), Peter Marsden (Chairman), Michael Ghirelli (Hon. Treasurer), Marian Miller (Hon. Librarian) and others