

# A428 Black Cat to Caxton Gibbet improvements

TR010044

Volume 9

9.55 Applicant's response to Cambridgeshire County Council's  
comments on archaeological mitigation areas

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

Rule 8(1)(k)

November 2021

Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning  
(Examination Procedure) Rules 2010**

**A428 Black Cat to Caxton Gibbet  
improvements  
Development Consent Order 202[ ]**

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# 1 Introduction

- 1.1.1 The updated Archaeological Mitigation Strategy (AMS) **[TR010044/EXAM/9.23v2]** contains the details of the areas which require archaeological mitigation.
- 1.1.2 At the time of writing, despite numerous meetings and e-mails, there remains a number of sites where the methodology and/or the extent of the areas are not agreed with Cambridgeshire County Council (CCC). These are as follows:
- a. The extent of the following mitigation areas has not been agreed: Site 11, Field 54 & 56; Site 18, Field 73 & 74; Site 32, Field 94; Site 33, Field 94; Site 34, Field 95; Sites 36, 37, 38 & 39, Field 97.
  - b. The methodology of the following mitigation areas has not been agreed, although the extent is agreed: Site 10, Field 53; Site 20, Field 75-76; Site 27, Field 88; Site 35, Field 69 & 70 West.
  - c. The methodology and extent of the following mitigation areas has not been agreed: Site 19, Field 58-62; Site 23, Field 80; Site 24, Field 83 & 84; Site 26, Field 86; Site 28, Field 90.
- 1.1.3 All other sites not listed above have been agreed with CCC.
- 1.1.4 Mitigation areas within the other local authority areas (Bedford Borough and Central Bedfordshire) have been agreed.
- 1.1.5 At the Issue Specific Hearing held on 24 September 2021, the Examining Authority requested that consultation with CCC continues. The Applicant has continued to correspond by email and has had a further meeting for the Statement of Common Ground. However, the Applicant is still satisfied that its mitigation strategy presented is robust and appropriate.
- 1.1.6 This document forms the Applicant's response to Cambridgeshire County Council's comments on the archaeological mitigation areas and provides the detail of CCC's comments on the mitigation areas discussed above (excluding Site 27, Field 88 and Site 35, Field 69 and 70 West as information has not been received from CCC on these specific sites). These specific comments from CCC were first received in August 2021. The Applicant's justification for maintaining the mitigation areas as presented in the Updated Archaeological Mitigation Strategy **[TR010044/EXAM/9.23v2]** is provided, and relevant maps, plans and photographs are also included.

## 2 Archaeological Approach

### 2.1 Evaluation

- 2.1.1 Archaeological evaluation is undertaken following an initial assessment of desk-based sources, including the Historic Environment Records, historic mapping and the analysis of aerial photographs and LiDAR. The aim of the evaluation is to determine not only the presence or absence of archaeological deposits, but also the extent, preservation and significance of any deposits.
- 2.1.2 Archaeological evaluation is defined in the Chartered Institute for Archaeologist's guidance as "a limited programme of non-intrusive and/or intrusive fieldwork which determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts and their research potential, within a specified area or site. If such archaeological remains are present, field evaluation defines their character, extent, quality and preservation, reports on them and enables an assessment of their significance in a local, regional, national or international context as appropriate."  
([https://www.archaeologists.net/sites/default/files/CIfAS%26GFieldevaluation\\_3.pdf](https://www.archaeologists.net/sites/default/files/CIfAS%26GFieldevaluation_3.pdf)).
- 2.1.3 All archaeological evaluation was discussed with the Curators. The Written Schemes of Investigation for the geophysical survey and the evaluation trenching were approved by all three Curators. The number, location and size of the evaluation trenches was approved by them. During the evaluation trenching changes were made (such as changes to alignment of trenches or the addition of new trenches) following the weekly site monitoring visits with the Curators.
- 2.1.4 As part of the evaluation, 599 ha were subject to geophysical survey. This included areas which were subsequently removed from the Order Limits due to the presence of significant archaeology. Geophysical survey involves walking in transects and measures a magnetic response to buried features. The resulting plots identify buried features.
- 2.1.5 To further evaluate the Scheme, three phases of evaluation trenching were undertaken. This was done in three phases and totalled 1339 trenches covering approximately 3.44% of the Scheme. This percentage is within the 3-4% industry standard for evaluation excavation. This covered 67,095 linear metres of trenching. The trenches are stripped of topsoil and subsoil by machine and any features are investigated by hand.
- 2.1.6 The results of the evaluation excavation confirmed the results of the geophysical survey, and the earlier analysis of aerial photographs. Some types of features and archaeological deposits don't always show on the geophysical survey so it is important to test areas seemingly blank of archaeology. Features not located on the geophysical survey were only found in two locations, in Field 80 forming a cremation burial and ring ditch,

and in Field 88 where an Iron Age pit was located. Both are being investigated in the mitigation.

## 2.2 Development of Mitigation Areas

- 2.2.1 The mitigation areas have been developed taking into account all available archaeological evidence. This includes the desk-based research, analysis of aerial photographs, and the results of the geophysical survey and evaluation trenching.
- 2.2.2 Enshrined within this has been the objective of maximising knowledge gain. The mitigation of the Scheme is not designed to allow recording for recording's sake, but rather to excavate those sites with intrinsic or group value, which will add to the corpus of knowledge for the region. This is in line with the approach undertaken on other major infrastructure projects such as HS2. Public benefit is also a key consideration and disseminating information is considered a better use of resources than excavating minor features that will not advance knowledge.
- 2.2.3 Based on the results of the evaluation, the archaeology of the Scheme has been characterised and understood. The focus of the strategy is on those sites of highest importance, while sites of lesser importance have less intensive investigations.
- 2.2.4 There are three levels of mitigation requiring archaeological intervention (the fourth level is for fencing off). These are defined in paragraph 5.1.2 of the AMS **[REP3-010]** and are as follows:
- a. Sites with intrinsic value (i.e. those sites considered to be important so they need to be excavated fully and with increased sampling). These sites will provide answers to key research questions because of their significance or degree of survival. At these key sites additional percentages of individual features may be excavated to increase the finds assemblage, or additional techniques, such as geochemical analysis, may be undertaken
  - b. Sites with group value (those which, when examined in conjunction with other sites, have increased value. For example, these may examine different types of Iron Age enclosures, adjoining Iron Age enclosures, such as those at Sites 12 and 13, to assess their form, function and association, and the 'string settlements' – those that may be linked by a boundary ditch) and key sites (sites that require full excavation where their investigation is key to understanding a period or site type).
  - c. Targeted (sites that only need further investigation into certain features, such as structures, pits or boundaries to characterise their form and provide environmental information).

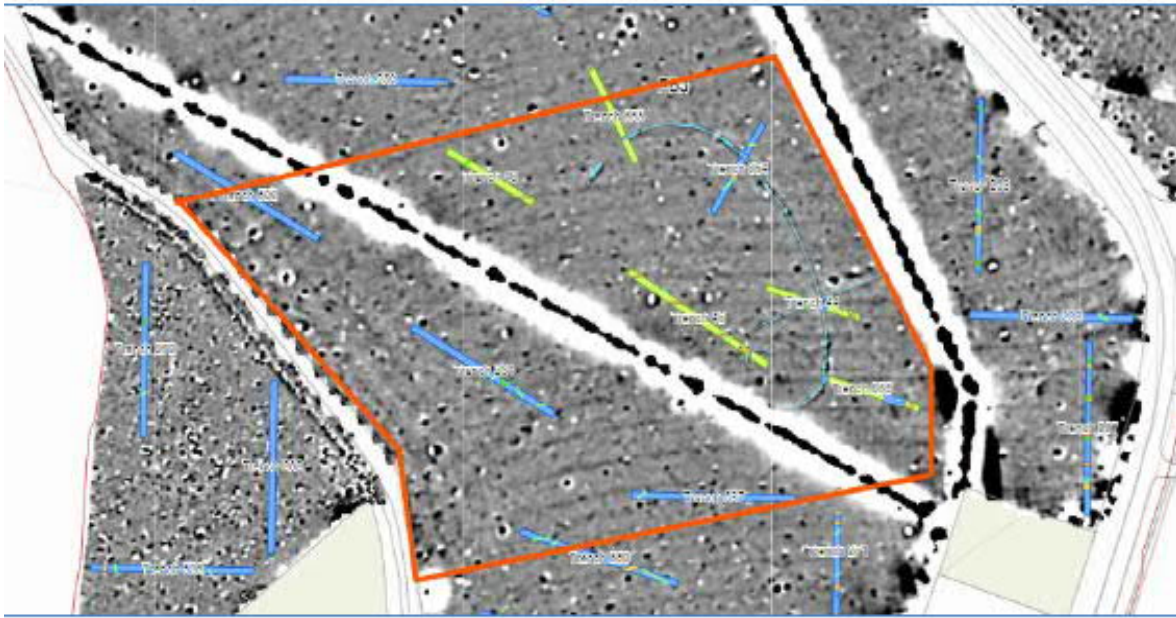
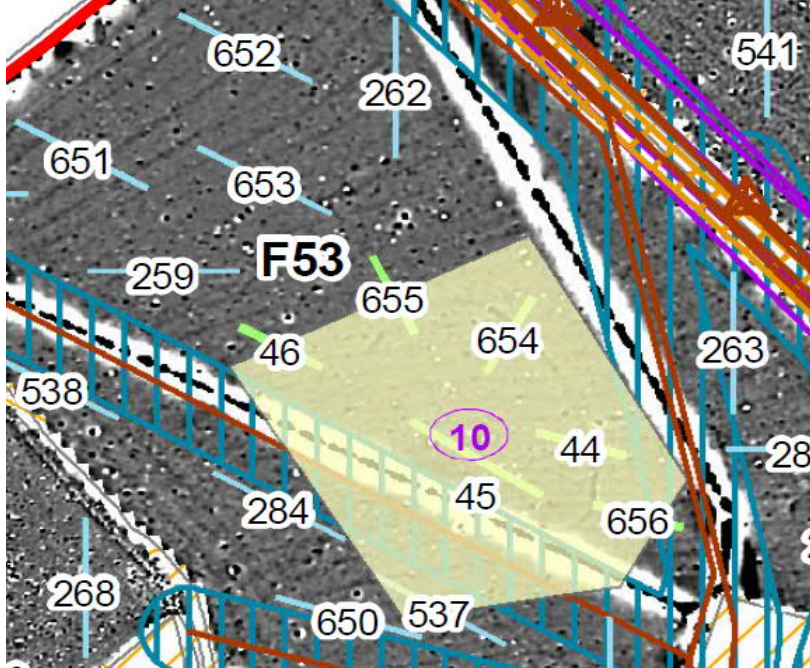
## 3 Mitigation Areas

### 3.1 Introduction

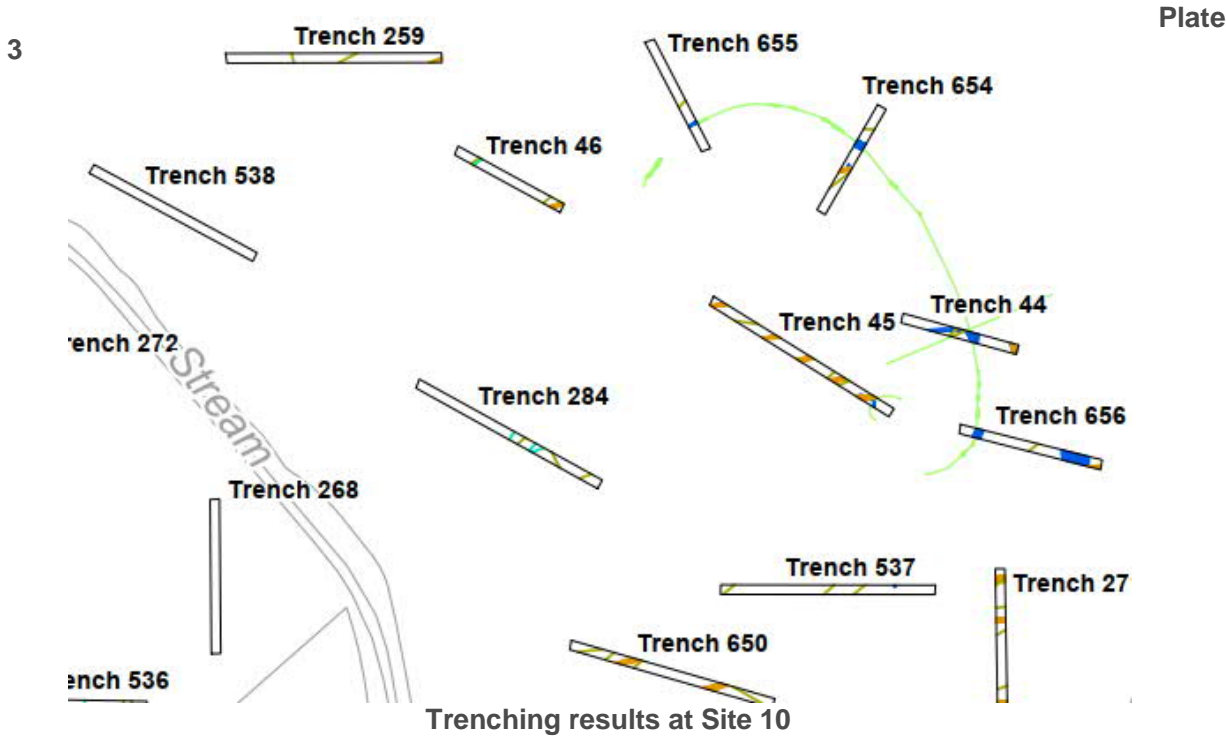
- 3.1.1 This section presents the position from CCC detailing their reasons for change of category or extension of the mitigation areas, alongside a response from the Applicant, detailing why the category change or the extension to the mitigation areas is not warranted.
- 3.1.2 Information already presented in the Examination is not repeated here. However, a cross-reference to the relevant documents is provided for clarity.
- 3.1.3 The information presented below detailing CCC's position is taken from comments provided to the Applicant in August 2021 on the Archaeological Mitigation Strategy **[REP3-010]**. It has been copied over verbatim. Spelling errors and typos have not been corrected.
- 3.1.4 When detailing the level of excavation, it should be noted that not all of each feature is necessarily excavated. The requirements for different feature types are detailed in paragraphs 8.3.7 and 9.2.9 and in Appendix B of the AMS.



**Table 3-1 - Applicant's Response to CCC's Comments on Archaeological Mitigation Areas**

Site Number and Field Number	CCC Position	Applicant Position
Site 10, Field 53	<p>The categorisation of the site is agreed but the area for examination is not. The excavation area needs to extend south-westwards towards the brook where deep colluvial soils infilled the small valley through which the brook courses. Examination of the old land surface (late prehistoric/Roman) will be possible once the colluvium has been stripped. If palaeochannels are present, appropriate palaeoenvironmental sampling and excavation will be required to address research objectives in 4.4.11 c-g</p>	<p>The extension of the excavation area southwards is not warranted and consequently no archaeological work is proposed here. Colluvial deposits will be examined (as discussed below) but the trenches undertaken during the evaluation phases in this location were largely devoid of archaeological features. Trenches 538, 284, 650 and 537 were located in the area proposed by CCC (NB the trench array which CCC have used in their image were subsequently amended during site works with their agreement). Of these, Trench 538 contained a palaeochannel (proposed for examination), Trench 284 was devoid of archaeological features, Trench 650 contained only a medieval or post-medieval furrow and Trench 537 contained an undated pit which extended outside of the trench and into the area covered by the mitigation area. Features in Trenches 284 and 650 do not merit further investigation.</p> <p>The colluvial deposits will be examined. The AMS states that the following is required: "Sampling of colluvium and palaeochannel along beck". As the extent of the colluvium would be defined by initial analysis, the Applicant did not want to be prescriptive about the size of the area to be investigated along the stream. The requirements for dealing with colluvium and palaeochannels are detailed in Section 10 of the AMS. Paragraph 10.2.10 states "Where warranted, areas identified for geoarchaeological assessment may be stripped to reveal archaeological features sealed by the colluvium. The requirement will be dependent upon the results of the boreholes." The strategy allows for sampling of both the colluvium deposits and the potential palaeochannel. The total extent of these deposits is unknown and will be identified within the area to be impacted by the Scheme. The exact methodology for the soil storage proposed across part of this area will be required before the impact on any colluvial deposits can be confirmed – if no soil stripping is required for construction, for example, there will be no impact.</p>
	 <p>Plate 1 Proposed CCC Area Site 10</p>	 <p>Plate 2 AMS Area Site 10</p>

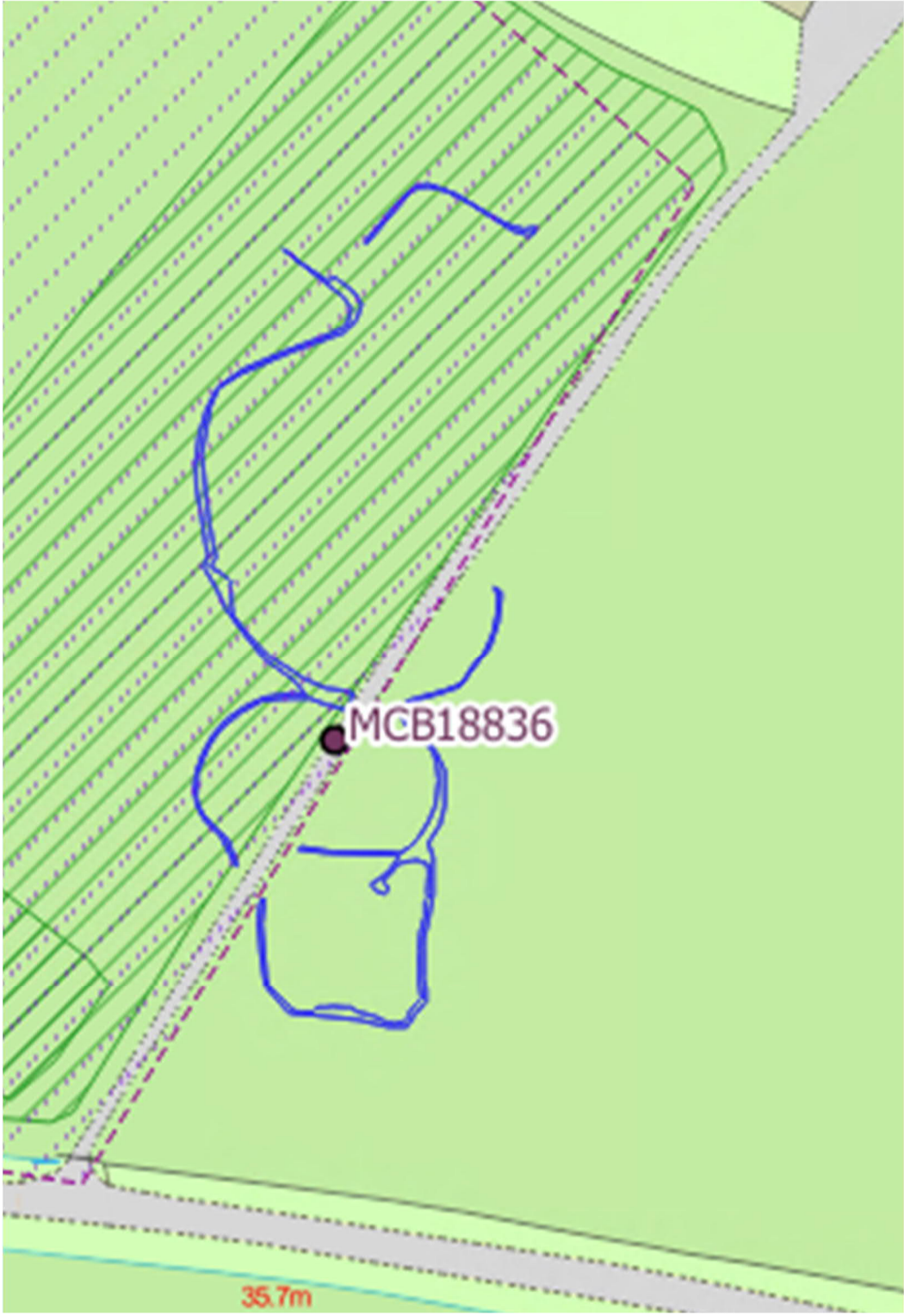
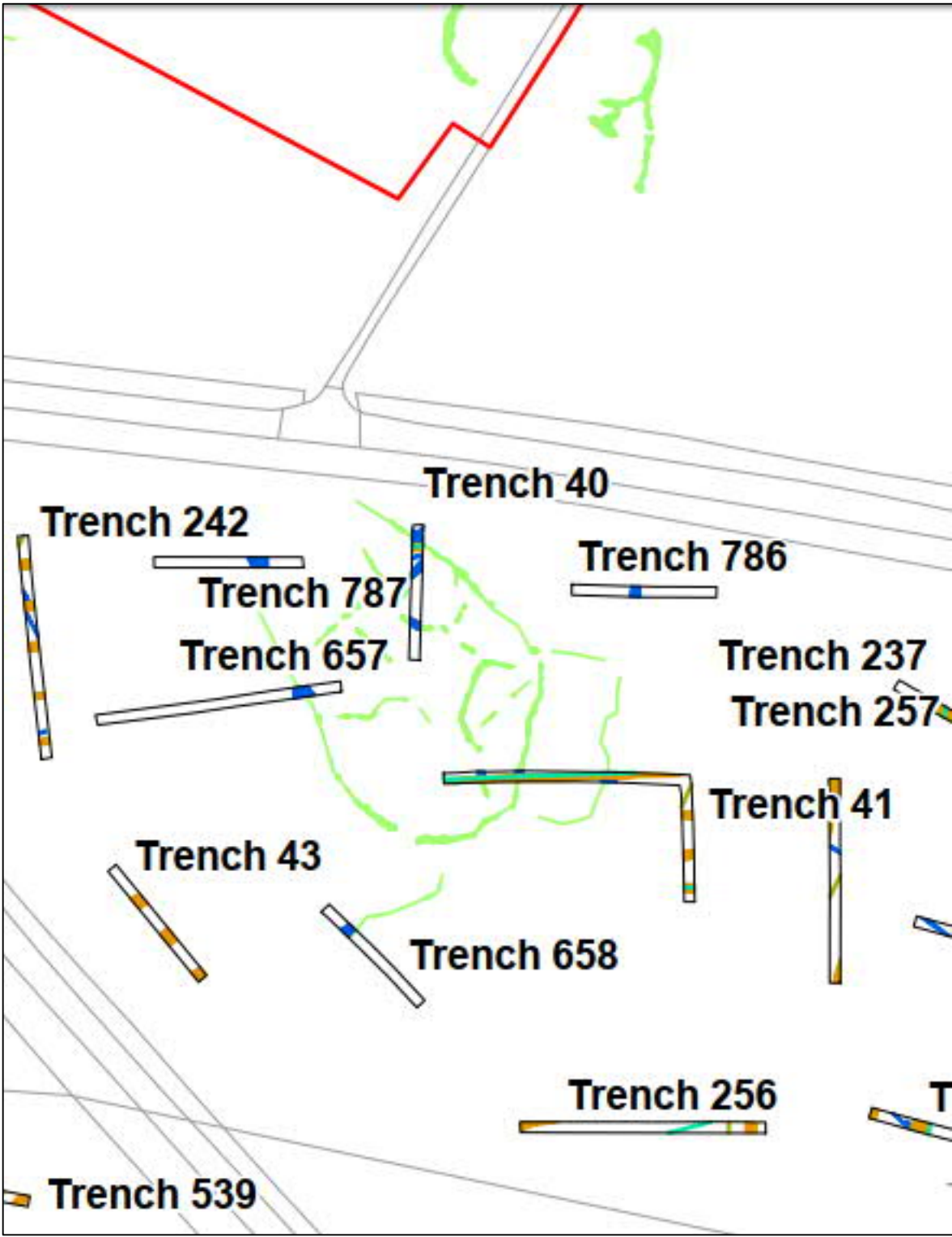


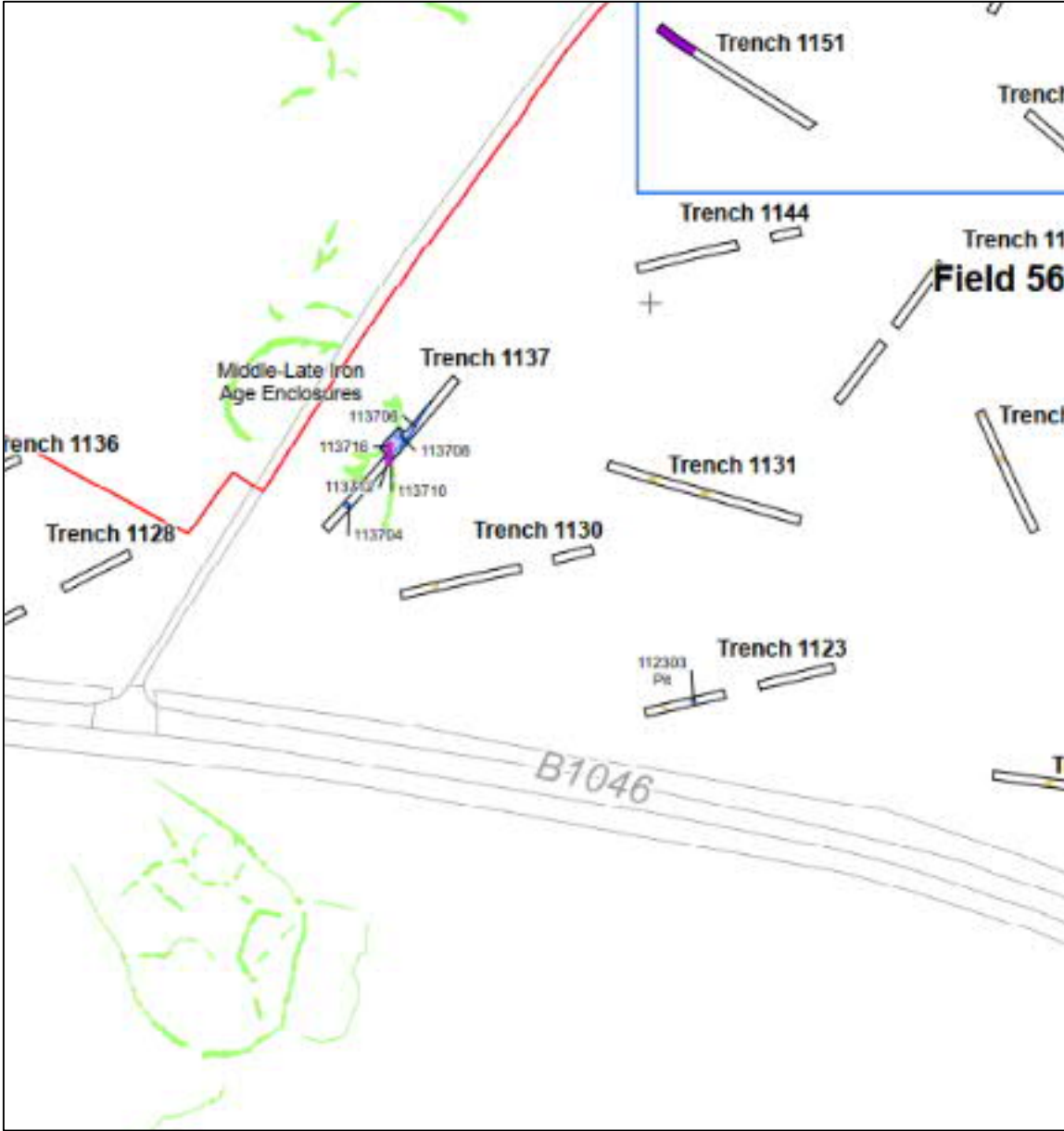
Site Number and Field Number	CCC Position	Applicant Position
		<p>3</p>  <p>Trenching results at Site 10</p> <p>Plate</p>
Site 11, Fields 54 & 56	<p>Categorisation is agreed but the excavation box in Appendix D requires enlarging as it is too tight to the geophysical anomalies of enclosures tested by evaluation, allowing little buffer to test evidence beyond the enclosures. As there is a chain of enclosures heading northwards out of the Order Limits (National Mapping Programme transcriptions of aerial photographic evidence on the Bedfordshire and Cambridgeshire Historic Environment Records attest – see also 6.3 ES Volume Appendix 6.4 <i>Geophysical Survey Phase 1&amp;2 Part 2</i> Figure C-10) we are able to see the broader landscape area occupied by Iron Age remains and this is true in Field 54 where they are known to extend west and south of the proposed excavation area (to Site 10 Field 53. The act of enclosure is a research objective proposed in this AMS and the move from unenclosed settlement in the earlier Iron Age to enclosed form in the middle of the period (4.4.8, 4.4.11a). The excavation area should be widened on its western and southern sides.</p>	<p>Following consultation with CCC on 15 and 29 October 2020 this area was extended and amalgamated. However, the extent of the area proposed by CCC was not agreed. In Field 54, Trenches 43, 256 and 787 on the western and southern side of the area were either blank or contained only furrows. To the east, the north-south arm of Trench 41 contained only furrows, and Trench 257 further east contained an undated ditch, which did not warrant inclusion in the mitigation area for this Iron Age site.</p> <p>In Field 56, at the northern end of the area proposed by CCC, Trench 1144 was blank and Trench 1151 contained only a modern material from demolition of a barn. While cropmark evidence is apparent in this area, based on this, the geophysical results and the trenching results, features identified as cropmarks are located within the mitigation area. The area was extended to address the initial concerns and to cover the site as one, rather than split into two.</p>



Site Number and Field Number	CCC Position	Applicant Position
	 <p>Plate 4 Proposed CCC Area Site 11</p>	 <p>Plate 5 AMS Site 11</p>



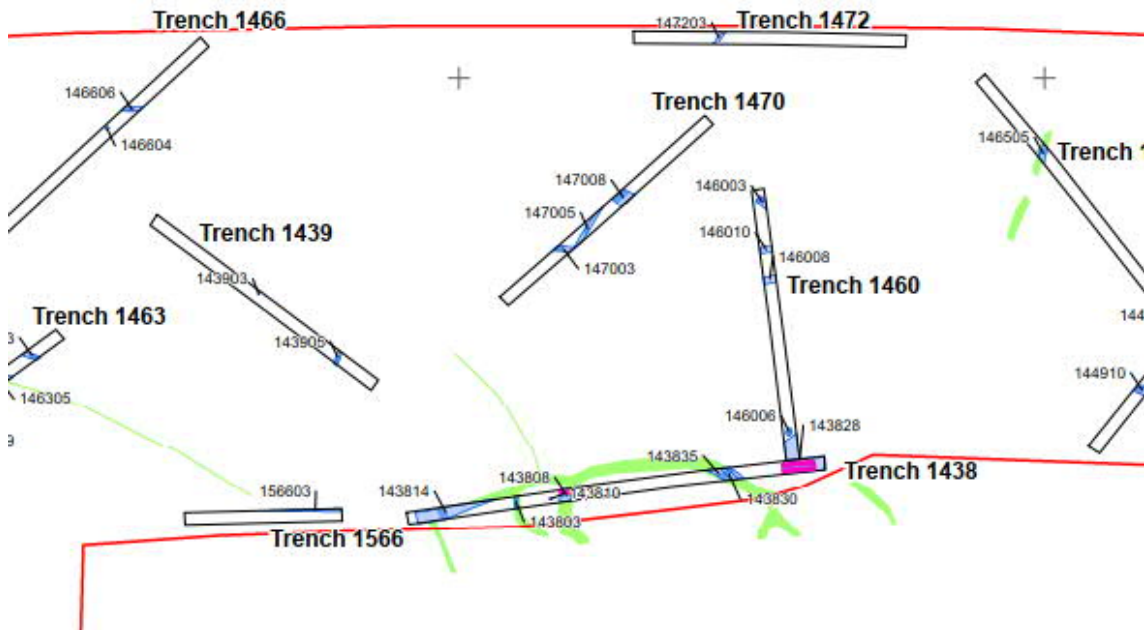

Site Number and Field Number	CCC Position	Applicant Position
	 <p>Plate 6 Cropmarks in Field 56</p>	 <p>Plate 7 Trenching Results at Site 11 in Field 54</p>

Site Number and Field Number	CCC Position	Applicant Position
		 <p data-bbox="1852 1524 2430 1556">Plate 8 Trenching Results at Site 11 in Field 56</p>
Site 18, Fields 73 & 74	<p data-bbox="394 1591 1549 1686">This is a major, productive long-lived Iron Age and Roman site but has an over-simplified description in this AMS. It should be subject to detailed excavation as a site of intrinsic qualities if the research objectives in 4.5 are to be realised.</p> <p data-bbox="394 1703 1549 1848">As discussed with the A428 archaeology team, while the area in Field 73 is approved, we do not agree with the area demarcated for excavation and consider that the Iron Age remains known within the Order Limits in the eastern part of the Field 74, which are associated with a large settlement (MCB19040) to the south of the Order Limits, are also excavated – to determine the relationship and evolution of the Iron Age and Roman settlements and fulfil the research objectives set out in 4.5 and</p>	<p data-bbox="1561 1591 2718 1686">Further detail on this site is available in the Applicant's comments on the Written Representation [REP3-008] from Cambridgeshire County Council/ Huntingdonshire District Council/ South Cambridgeshire District Council [REP1-046cf].</p> <p data-bbox="1561 1703 2718 1848">The change in category to this mitigation area has not been raised by CCC previously. Although the site contains extensive archaeological remains forming Iron Age and Romano-British enclosures, these are not of a level to warrant being considered to be of intrinsic value (i.e. they are not so important as to need to be excavated extensively and with increased sampling) but rather is a key site (a site that requires full excavation where investigation is key to understanding a period or site</p>

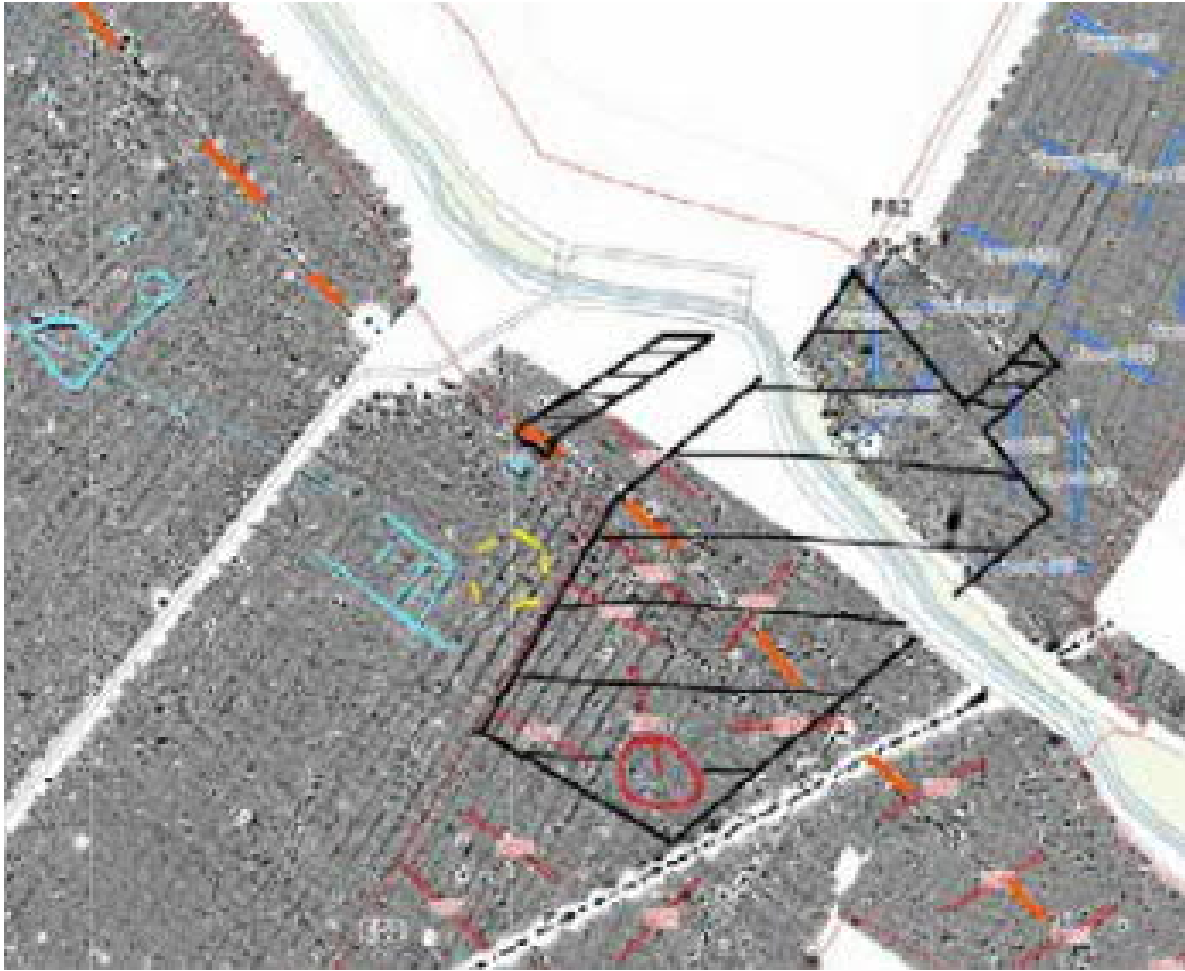
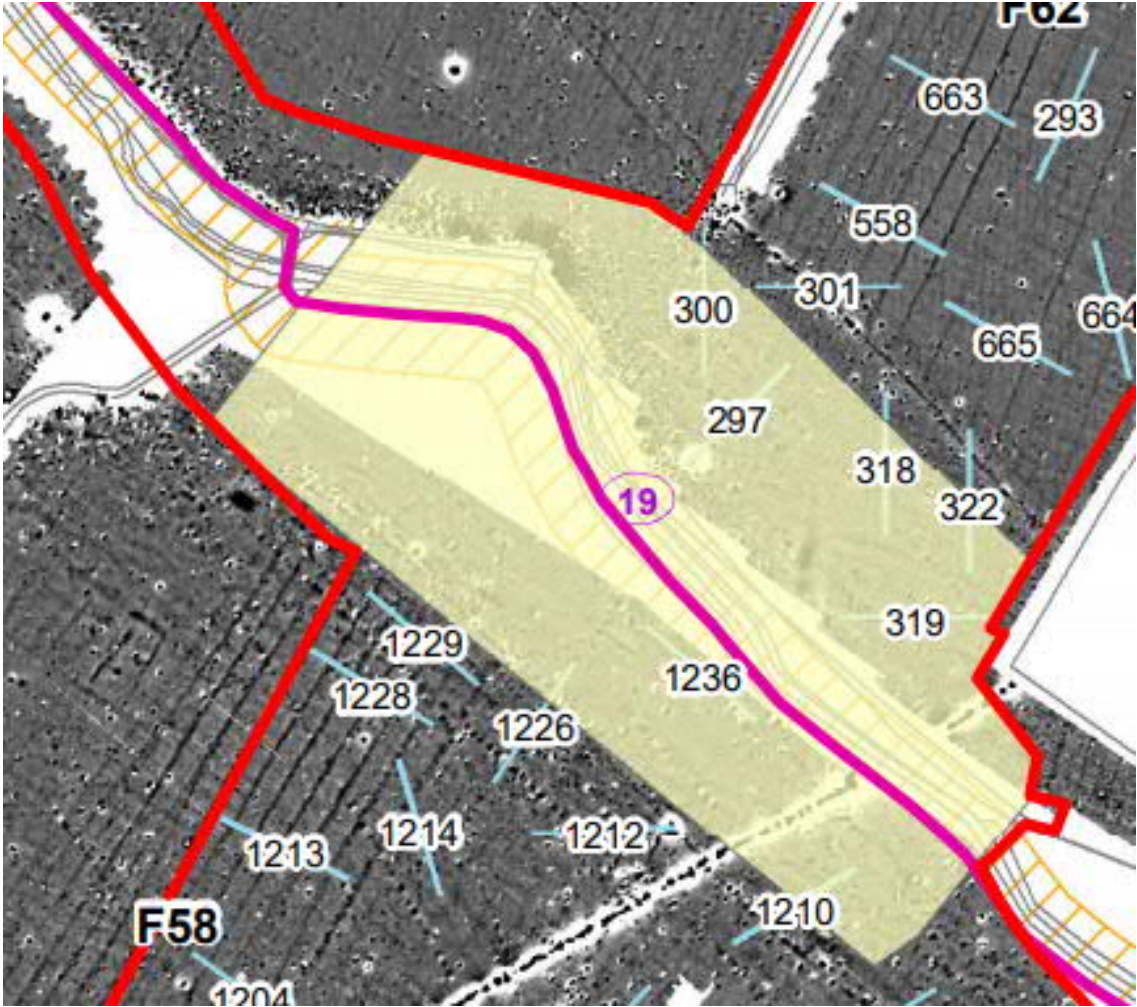


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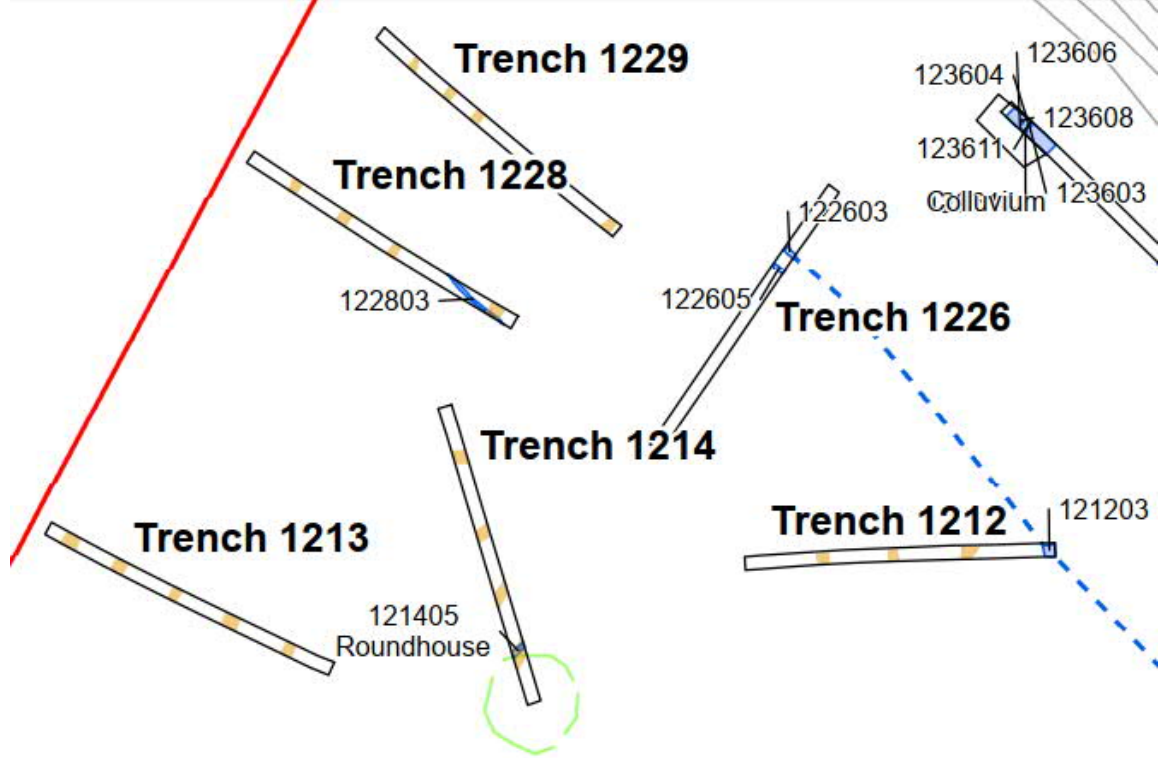


Site Number and Field Number	CCC Position	Applicant Position
		<div></div> <p>Plate 11 Trenching Results at Site 18, Field 74</p> <div></div> <p>Plate 12 Field 74 Cropmarks</p>

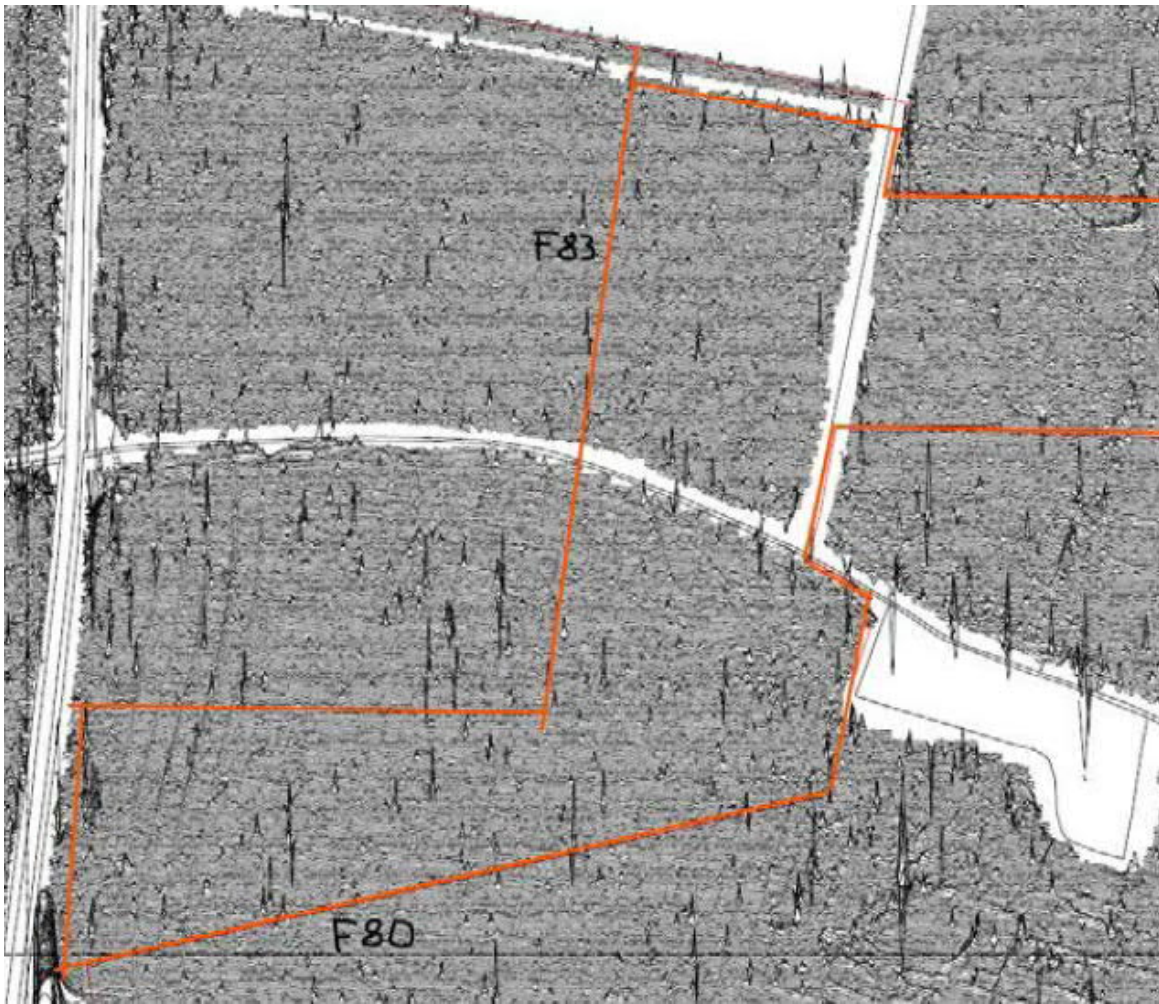
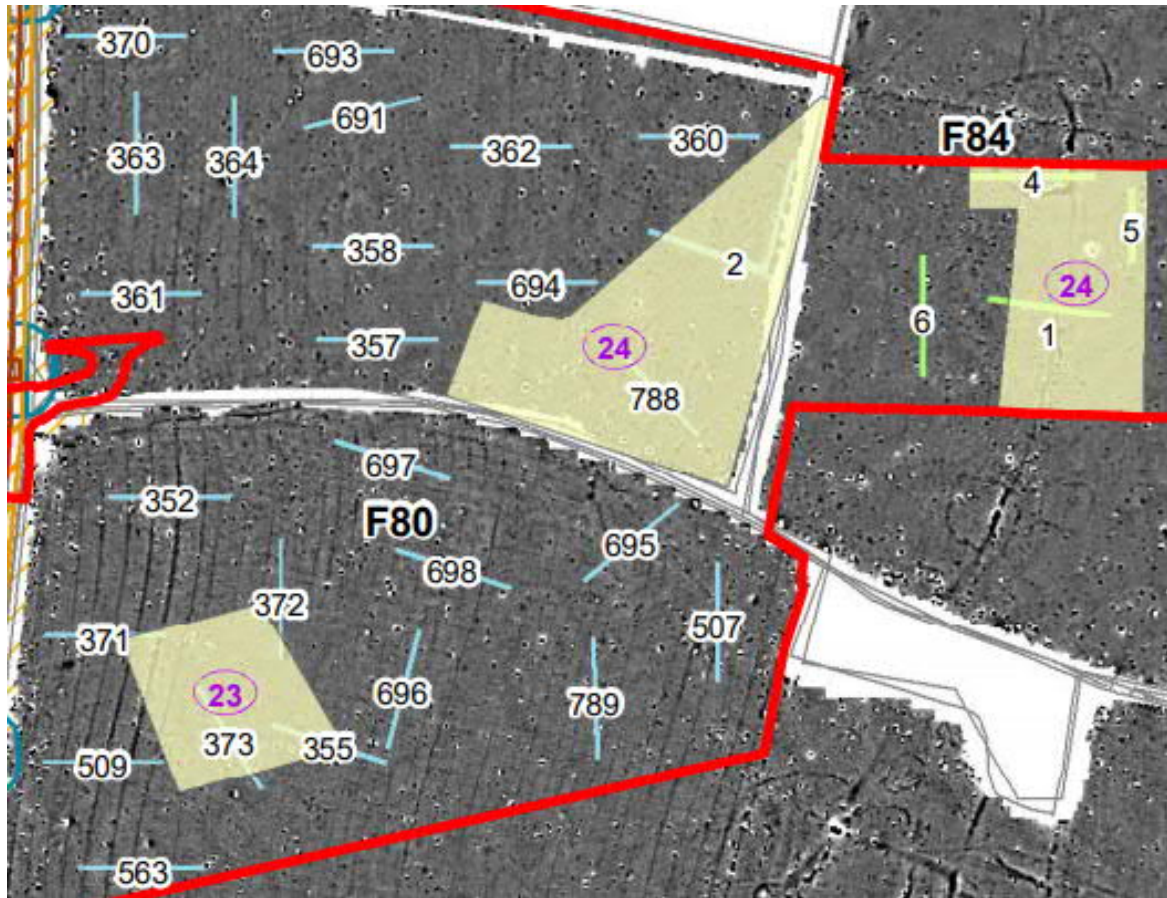
Site Number and Field Number	CCC Position	Applicant Position
The cSite 19, Fields 58 & 62	<p>Deep colluvial and alluvial soil deposits associated with Hen Brook and the impact of cultivation (possibly Medieval but could be earlier) were seen in the evaluation trenches to seal old land surface soils and cut feature evidence (as well as tree boles). If the relationship of sites to water courses and water sources is to be understood, an area previously discussed with the A428 archaeological team should be stripped for examination around the brook. The stripped area should be extended southwards to include a round house found in Field 58 by geophysical survey and tested in the evaluation. More, similar remains may be present as the wider archaeological evidence (geophysical survey and air photos) indicate association with the more extensive settlement evinced in Field 60 outside the Order Limits, on the SE side of the current A428 and in Wintringham Park (WP Site 2, A428 Site 14). It is likely that this is riverside settlement.</p> <p>Palaeochannels and old land surface soils that may be present must be subject to a full suite of palaeoenvironmental sampling measures to enable the signature of past human environments to be established. This is a requirement of the JAAB and is rehearsed in the research objectives at 4.4.8 and 4.4.11c and d.</p>	<p>This mitigation area is proposed for geoarchaeological and palaeoenvironmental assessment. Section 10 of the AMS details the requirements for geoarchaeological and palaeoenvironmental assessment. Section 10.2.10 includes a requirement to strip soil to reveal archaeological features sealed by the colluvium. The AMS also requires a Site Specific WSI to be prepared by the Archaeological Contractor for approval by CCC. A suitably experienced geoarchaeologist must be involved in this process.</p> <p>There is no justification to extend the excavation to the south to cover the ring ditch. Excavation of the feature would not meet the research aims detailed in Section 4 of the AMS, as it is shallow (at 0.22m). There would be no further knowledge gain from its excavation as its form is recorded on the geophysical survey, and it is understood as the shallow, heavily ploughed remains of an Iron Age roundhouse. No further information will be gained from further excavation and there is no public benefit from excavating it.</p> <p>Wintringham Park Site 2 is not a riverside settlement, but rather a Middle Iron Age settlement located on a north-south driveway. There was no evidence that it was focused on Hen Beck, either from the evaluations undertaken by both of the archaeological contractors, MOLA and Oxford Archaeology East, analysis of aerial photography or the geophysical survey. Indeed, all of the settlements from Loves Farm, south beyond Hen Brook, are on the higher ridges of ground and have not been attested beside the becks. This was reinforced by the extensive A428 evaluations, comprising geophysical survey and aerial photographic analysis, and 14 evaluation trenches to the south of Hen Brook in Field 58 (south of the colluvium indicated by the dashed orange line on Plate 13) and north of the enclosure forming Site 13, and others to the north of the brook, but the only feature was the shallow ring ditch 1214. A former field boundary and minor features related to this were also noted. As a consequence there is no justification to extend the mitigation area.</p> <p>Please note that the mitigation area may be extended westwards along the Brook where an access track is proposed. The construction methodology is awaited from the Principal Contractor for this area. This is needed so the impact on the colluvial deposits can be assessed to determine if the area will require mitigation. This is a separate area to that proposed by CCC on Plate 13.</p>

Site Number and Field Number	CCC Position	Applicant Position
	 <p>Plate 13 Proposed CCC Area Site 19</p>	 <p>Plate 14 AMS Area Site 19</p>

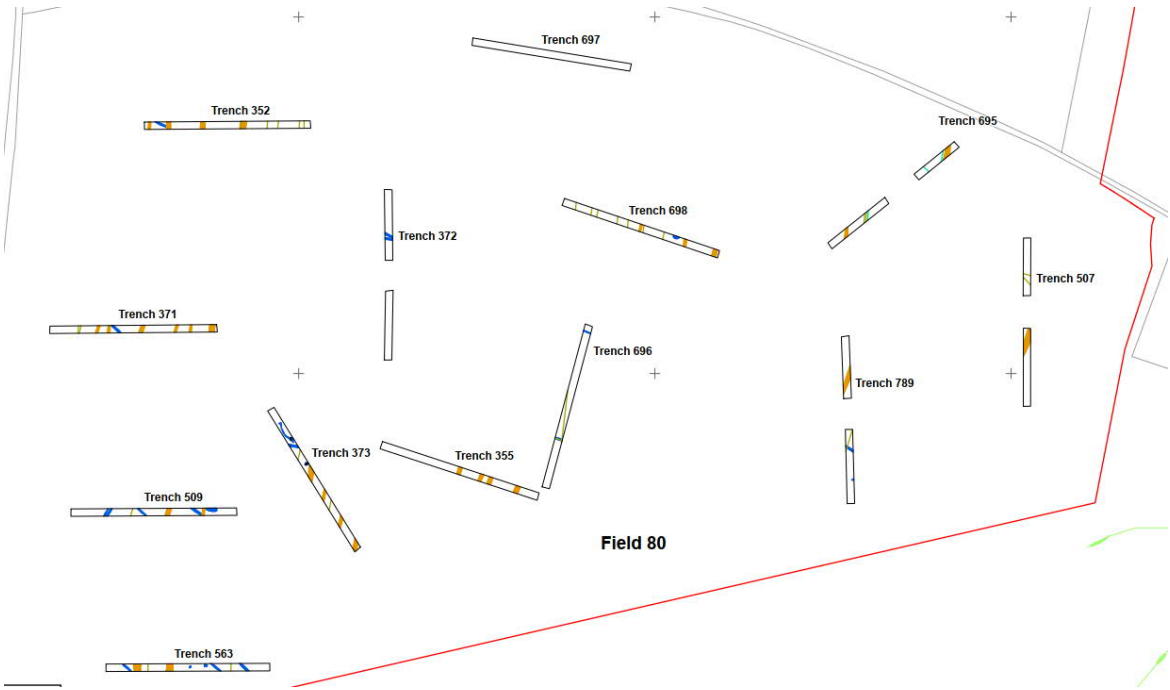


Site Number and Field Number	CCC Position	Applicant Position
		 <p><b>Plate 15 Trenching Results at Site 19, Field 58</b></p>
Site 20, Fields 75 & 76	This is an Iron Age settlement similar to those categorised as having Group Value. The mitigation response should therefore be consistent and enable this site to be properly investigated according to the rationale. We do not agree to the current low intensity sampling strategy. The area for excavation is approved.	The detail in Table 5-5 of the AMS states “Sample ditch and excavate enclosure.” This is also stated in the table in Appendix D to the AMS. We are not proposing a low intensity sampling strategy for the enclosure. The line of the Roman road under the existing access track will be sampled, once the new farmer’s access is constructed. This will be a targeted investigation along the line of the Roman road and adjoining ditch. This will be focused in the location where it is determined in the field that there is the best surviving length of the road. This approach is based upon the experience that these roads are used, eroded and then repaired, and so the potential for survival along the full route is unlikely.
Site 23, Field 80	<p>This small excavation area focusses on some of the archaeological evidence found in this field and in Fields 83 to the north and 84 to the northwest.</p> <p>This cluster of fields hosts unenclosed Iron Age settlement, meaning that its elements are dispersed in the landscape. That cremation burial evidence was also found, raises the significance of the area and allows investigation of burial practices and rites. This area is related to small enclosures associated with the ‘string boundary’ in Field 84. This appears to have a westward triangular appendage (into Field 83) with subdivisions and features within – seen on the geophysical survey results. Features are of unknown date but are suspected to be Iron Age with possible Romanised landscape features based on the morphology of the enclosures evident south of Field 80. If we are to include the Romanisation of the landscape, influence of a new order, and the examination of fields as part of the research objectives, then this field provides an opportunity to do so. The eastern third of Field 83m should be excavated in tandem with western part of Field 84 and wider parts of Field 80, to understand the character of unenclosed Iron Age settlement prior to enclosure.</p>	<p>There is no justification to extend the area as indicated by CCC. The mitigation area is targeted upon features located during evaluation trenching. An area of 0.44ha will be investigated around the two features recorded to date. In many of the known examples for unenclosed settlements in the region they are often found to be associated with other features such as boundaries or field systems (such as at Loves Farm Phase 3.2 field system 1 and the Hansoms Mill site, both in Cambridgeshire, and more recently on the A428 at Field 34 where there was an unenclosed post-hole structure, in Central Bedfordshire). The proposed programme of excavation at Field 84 is designed to establish the character and form of the roundhouse within Trench 373, together with its association with the north-south string boundary to the east.</p> <p>Fifteen trenches were excavated across this area. While some evidence of a medieval or post-medieval field system was recorded, only Trench 373 contained remains of Iron Age date. The remaining trenches were empty. No features were identified during the geophysical survey. The purpose of the trenching is to evaluate the area and test the results of the geophysical survey. We are confident that this has been achieved and that the mitigation area is proportionate. It should be</p>



Site Number and Field Number	CCC Position	Applicant Position
	<p>We recommend that this part of the scheme is subject to more comprehensive stripping to understand the nature of settlement and land use here. The settlement and burial evidence should be excavated in conformity to the JAAB and be consistent with the Group Value category for sites associated with the new string boundary Iron Age settlement and landscape forms recently identified in Cambridgeshire during the course of the A14 Improvement Scheme excavations.</p>	<p>noted that there are mechanisms in place should features extend outside of the mitigation area or if other features are located outside of the area. These are detailed in paragraph 5.1.18-5.1.21 of the AMS. The evaluation identified an isolated prehistoric burial. Such Middle Iron Age burials are known from the wider area (e.g. Bobs Wood, Hinchingsbrooke; Stanground South, Peterborough) and whilst other small inhumation cemeteries are known in the south of England they have not been found in Cambridgeshire. There is a protocol for notifying the Clerk of Works about the discovery of human remains, including specific toolbox talks, and this will be enforced on the Scheme.</p> <p>For clarity, trenches within the area proposed by CCC were as follows: Trenches 372, 509, 696, and 697 contained furrows and features likely to be part of a medieval/post-medieval field system, while Trench 789 also contained other undated features. Trenches 355, 365, 367, 507, 695 and 698 contained only furrows, and Trenches 514, 564 and 565 were blank.</p> <p>While the possible connection to the string settlement in Field 84 is noted, there is no justification to extend the mitigation area due to the lack of archaeological evidence found during the evaluation. The discovery of these features indicates that the evaluation has worked as it has located features not shown on the geophysical survey.</p>
	 <p>Plate 16 Proposed CCC Area Sites 23 and 24</p>	 <p>Plate 17 AMS Area Sites 23 and 24</p>



Site Number and Field Number	CCC Position	Applicant Position
		 <p><b>Plate 18 Trenching Results at Site 23, Field 80</b></p>
Site 24, Fields 83 & 84	<p>Proposals for the wider settlement evidence described above (that is: (i) unenclosed, (ii) settlement and paddock enclosures associated with a sinuous long distance string boundary, (iii) Romanised elements of rectilinear boundaries associated with a known Roman south of the Orders Limits), are shown in Appendix D as two areas for excavation. One to the east is tightly focused on the string boundary and its enclosures, the second to the west on the rectilinear evidence of the scheme. It is unclear why these are not conjoined, given there is contemporary evidence on the west side of Field 84 and as the research objectives seek to interrogate spaces between sites, fields and unenclosed settlement forms.</p> <p>The course of Gallow Brook to the south of Fields 83 and 84, north of Field 80 provides opportunity of focused geoarchaeological investigation.</p> <p>We do not agree to this narrow excavation area focused on specific elements while others are discounted.</p>	<p>There are a number of string settlements recorded on the Scheme, including those in Field 90 and Field 92, as well as a possible string settlement in Field 49. The example in Field 84 only covers a small section of a much larger string settlement which extends to the north and south, where a much larger enclosure is indicated on the geophysical survey. Resources are better spent investigating those sites where there is more evidence within the Order Limits. The excavation is focused upon a linear north-south aligned ditch forming part of the 'string', along with a small enclosure revealed during the geophysical survey. The Applicant's proposal for investigation at this site is focused along the length of the feature as it crosses the road corridor. The relationships of this boundary with other features (if any) will be undertaken to characterise the date, form, and possible function of the string settlement. Other examples of this type of settlement will be investigated at Sites 9, 24 and 28, and a holistic view to inform the understanding of their date, character, form and environment within the wider landscape, will be undertaken. The western part of the mitigation area in Field 83 has been extended to accommodate features noted on the X-Y geophysical plot, including a possible enclosure ditch and a possible unenclosed roundhouse, following consultation with CCC. Extending this area to the north and west is not required as trenches 360, 362 and 694 contained only furrows, and there is no further evidence on the geophysical survey.</p> <p>In Field 84, the area identified is to record and sample the string settlement where it is impacted by road construction. While a feature extends westwards from the string towards Field 83, this feature will be excavated within both parts of this mitigation area and has been sampled during the evaluation.</p> <p>There was no evidence reported (Phase 1 Evaluation Excavation, Appendix 6-6) <b>[APP-173 and APP-174]</b> for any deposits which may contain geoarchaeological potential associated with Gallow Brook in this area. Furthermore this site was not identified by MOLA's Senior Geoarchaeologist in Section 7.5 of the Phase 3 Evaluation Excavation (Appendix 6-8) <b>[APP-176]</b>.</p>

Site Number and Field Number	CCC Position	Applicant Position
Site 26, Field 86	<p>The excavation box is very tight to the fragmentary evidence revealed in the geophysical survey. We have recommended widening a short distance. it to allow for a clearer view of the limits of the settlement evidence.</p> <p>The proposed strategy – to sample excavate the site may be too little for the evidence. Flexibility to scale up the intensity of excavation should be enabled.</p>	<p>There is no justification to extend the area or to undertake more than targeted excavation. The geophysical survey indicates that this is the south-west corner of a ditch that is on the northern edge of the Order Limits. The extent of the feature will be incorporated within the area proposed and the course of the feature was recognised in the evaluation report. A trench was excavated during the evaluation (Trench 8) to the east and Trench 701 was excavated to the west. Neither of these trenches contained any features other than furrows. No Iron Age remains extend this far and it is not commensurate with the available evidence to extend the area. There is a clear picture over the limit of the archaeological evidence here. The site is located at the southern limit of the Iron Age enclosure and the boundary.</p>

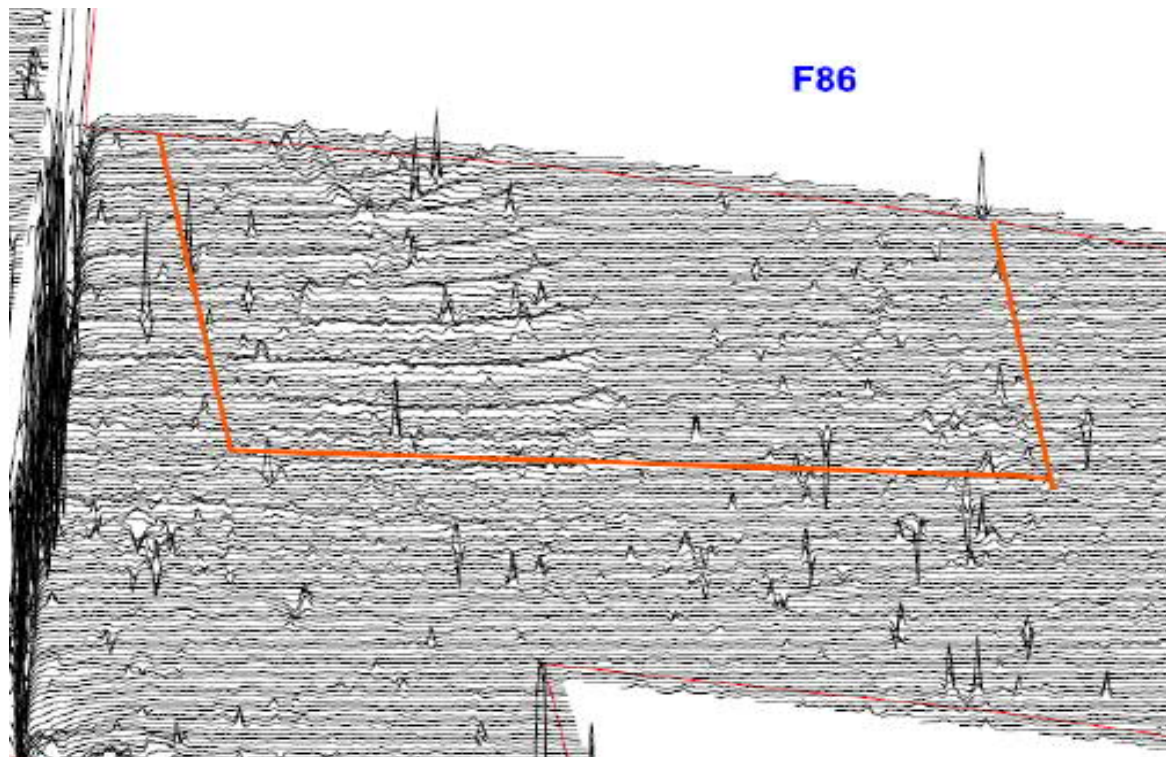


Plate 19 Proposed CCC Area Site 26

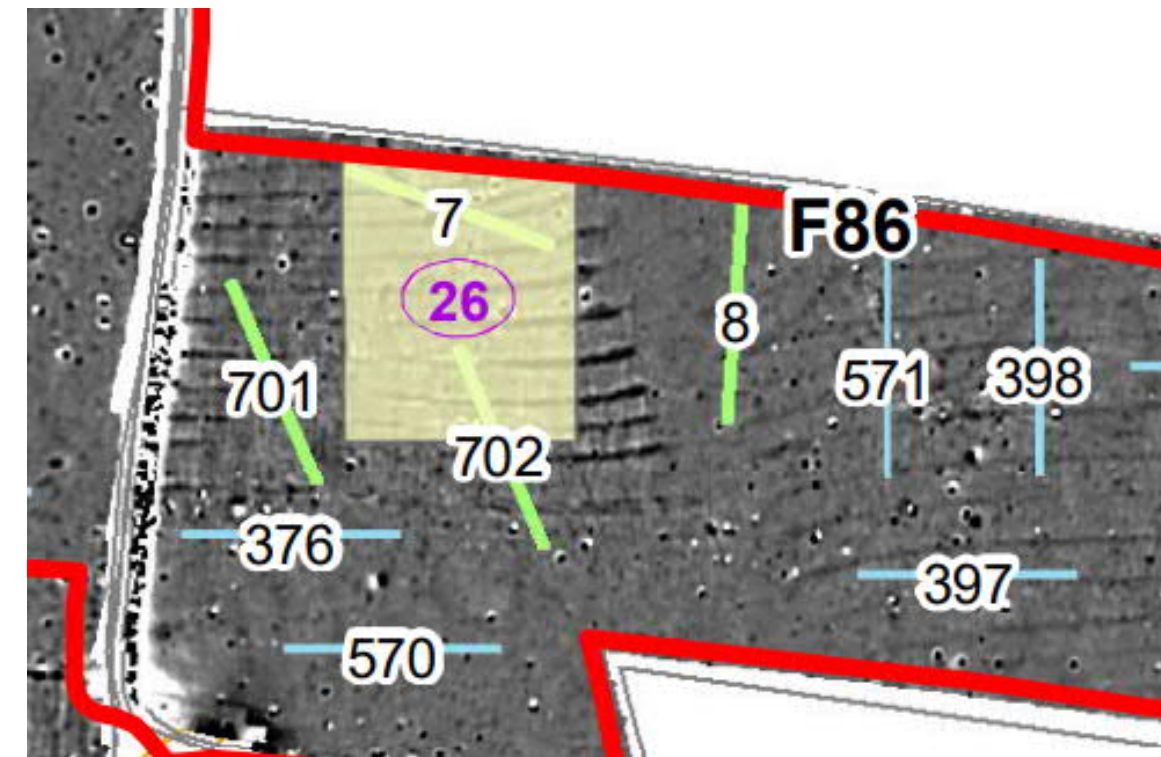


Plate 20 AMS Area Site 26

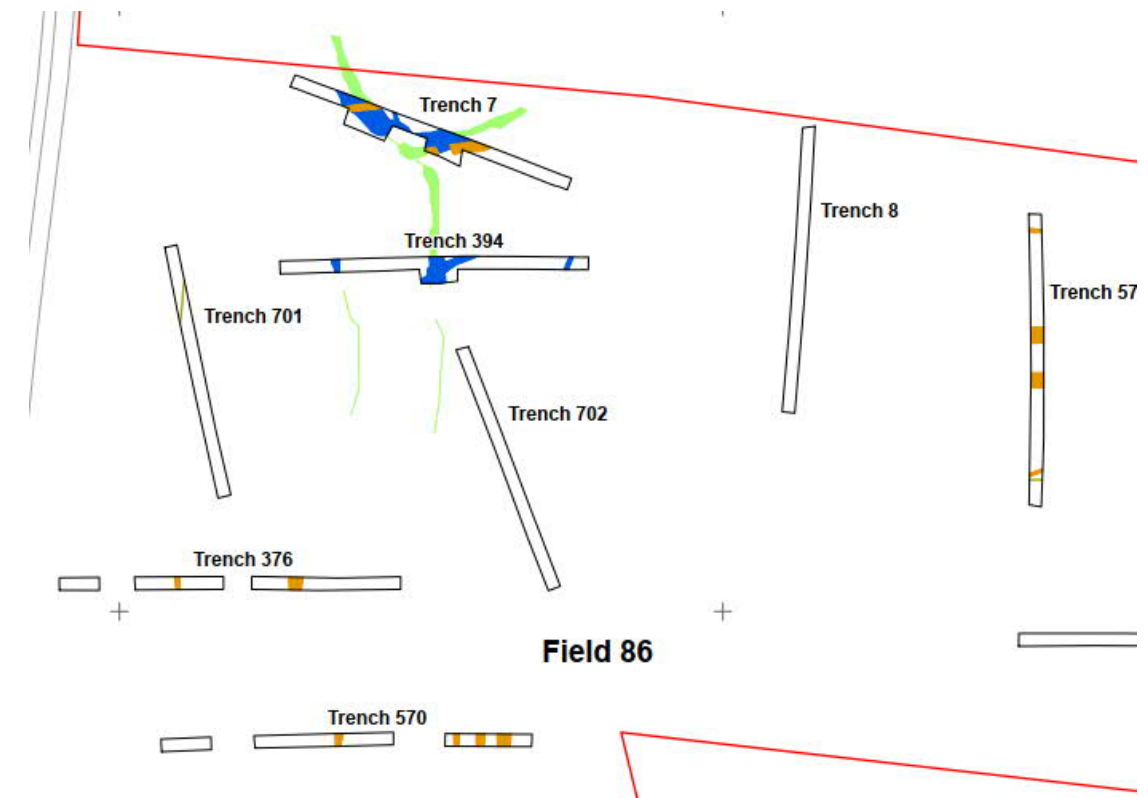
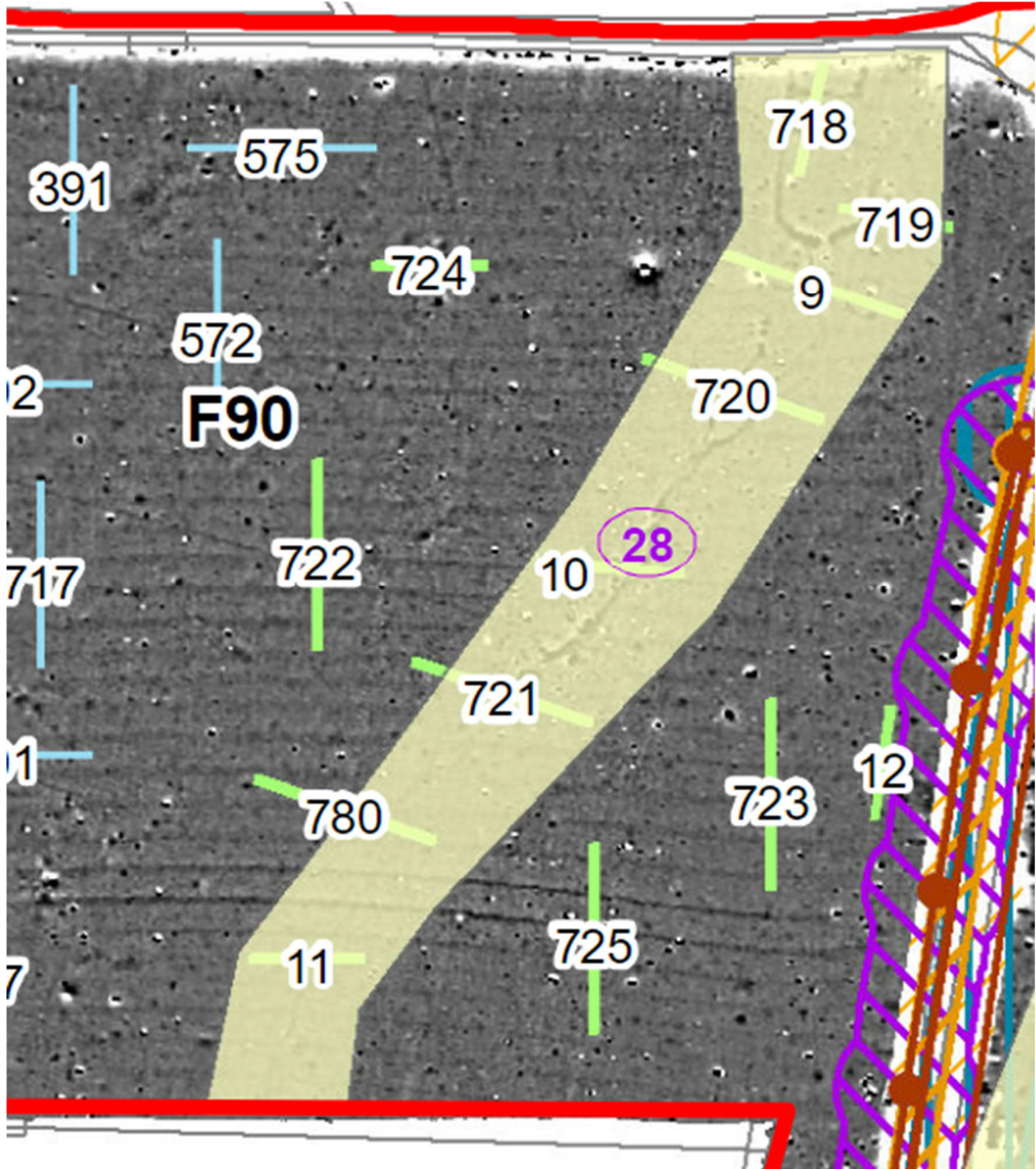


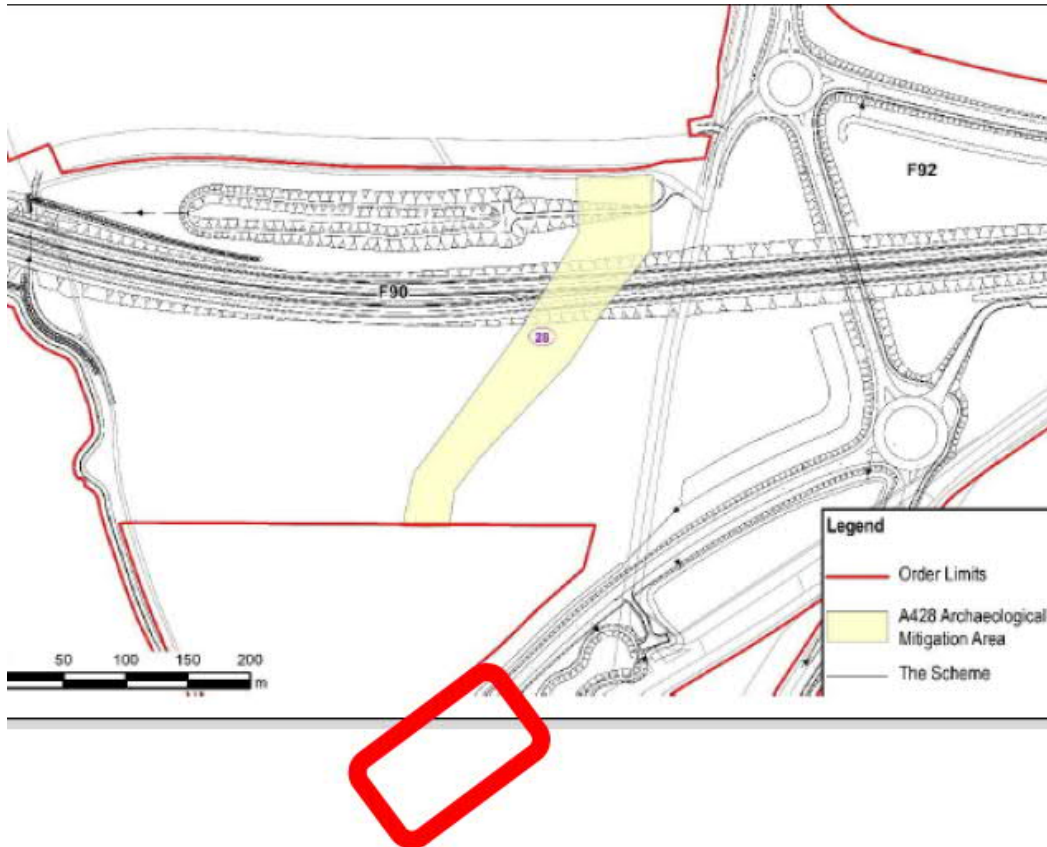
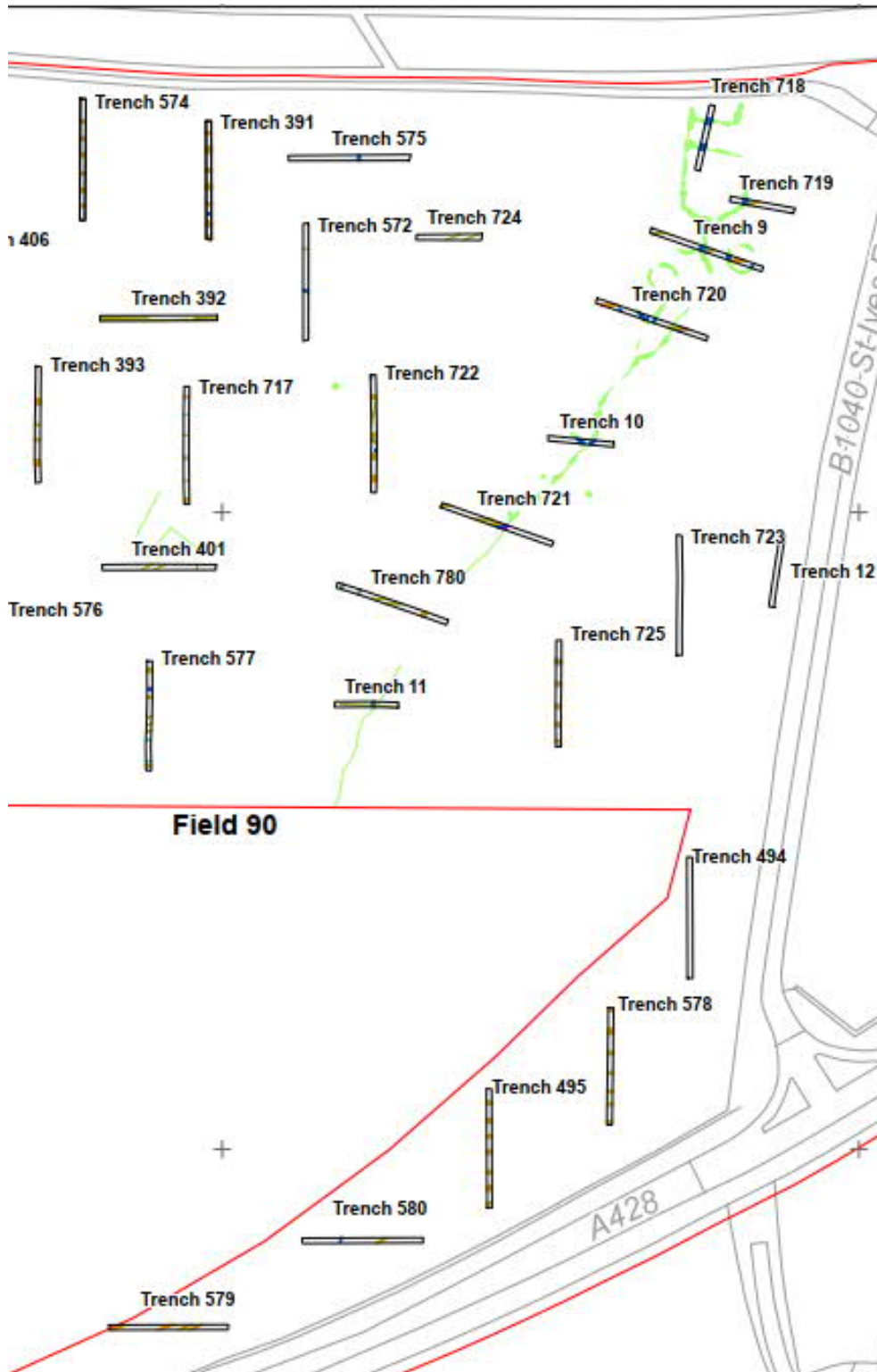
Plate 21 Trenching Results at Site 26, Field 86

Site Number and Field Number	CCC Position	Applicant Position
Site 28, Field 90	<p>This site has been miscategorised for sample excavation, yet the new site form of enclosures linked to a string boundary should be classed in category b – Group Value. A form of site recognised by research conducted on the clay landscape of the A14 excavations, industrial and craft activities were found to take place beyond the boundary, where houses and paddocks saw close enclosure along sinuous ditches.</p> <p>The site in Field 90 appears to have elements extending into Field 92, across the B1040, the St Ives Road, in which Iron Age and Roman settlement is present. A small excavation link to the east has been recommended to enable these sites to be properly mapped and recorded prior to removal through construction impact, and to the west to encompass geophysical anomalies for which further exploration is required.</p> <p>The maplet in Appendix D is also not approved.</p>	<p>CCC state that elements of this site extend into Field 92 to the east. This appears to be based on a feature CCC have identified on the geophysical X-Y plot that is not apparent to the geophysical team or the A428 team. However, even if this feature survives, it would be picked up in both the Field 90 (Site 28) and Field 92 (Site 30) mitigation areas.</p> <p>There is no justification for the extended area proposed by CCC. There were no archaeological remains in the trenches in that area. Trenches 401 contained only furrows while 577 contained two undated pits. Extension into this area is not warranted. The strategy of targeted excavation at this site will strip an area of 1.52ha along the length of this boundary and examine the relationships of any linking ditches and the circular structures. There is no merit in exposing any further areas where the string boundary potentially extends. As stated in the evaluation report, “further investigation into the boundary itself is unlikely to provide any additional information to what has already been recorded” (Appendix 6.6 paragraph 7.4.14) <b>[APP-173]</b>, so extension of the area southwards will not add to the corpus of knowledge.</p> <p>In the southern part of the field, adjacent to the existing A428, where CCC have requested an additional area in October 2021 to be added to the mitigation area, there were again few features located. One undated ditch section was seen in Trench 580, while other trenches in this area only contained furrows. As such, extending the area is not justified. The map shown in Appendix D of the AMS (see also Plate 24 below) will not be updated.</p>

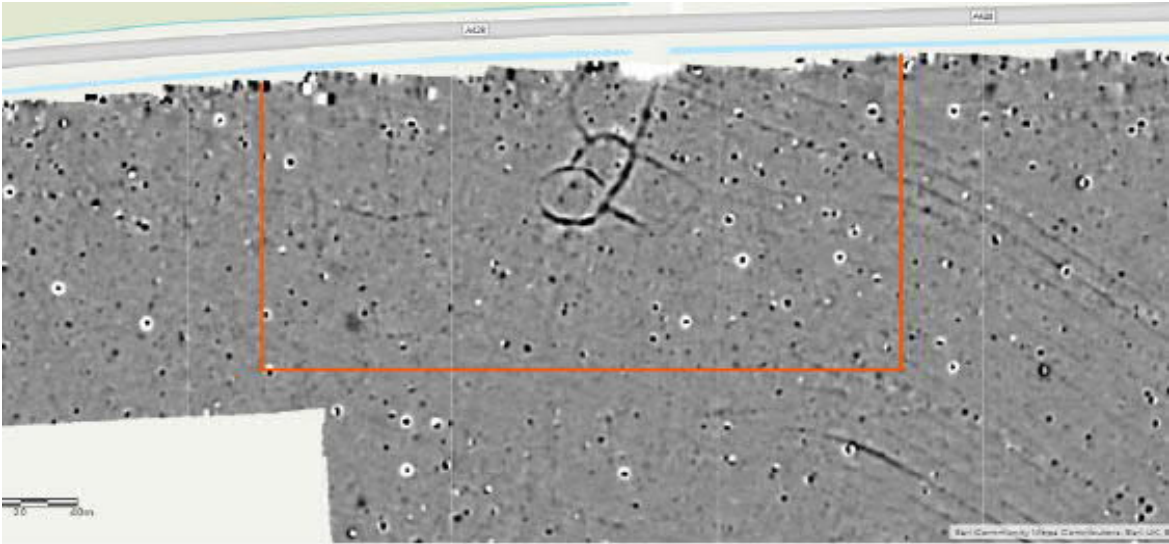
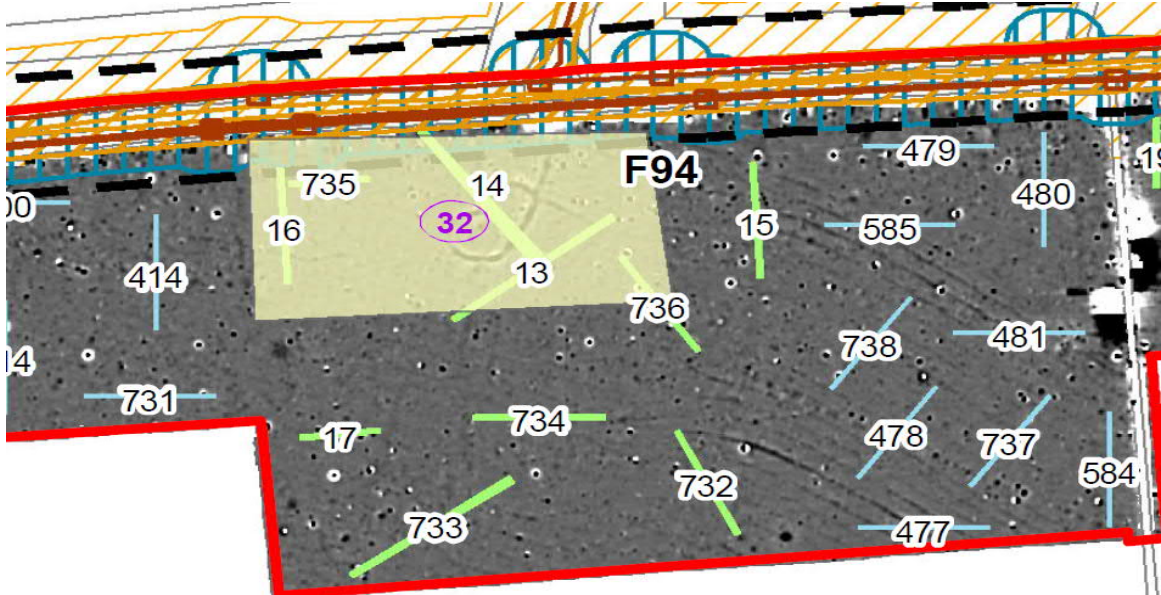
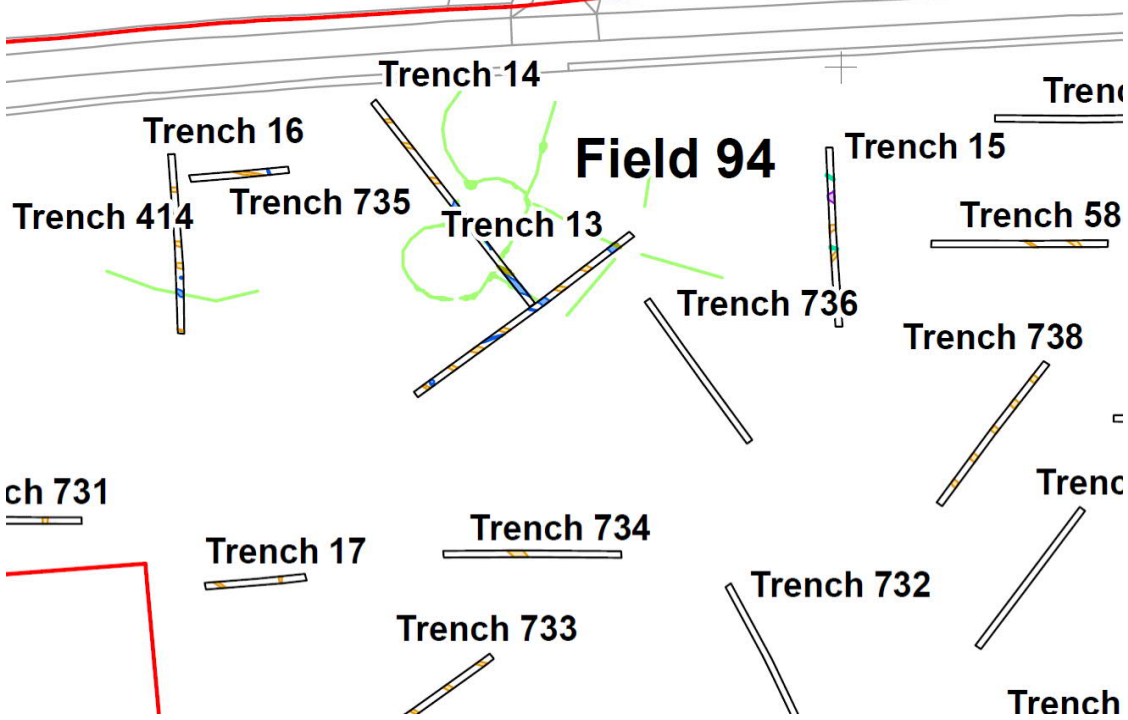


Site Number and Field Number	CCC Position	Applicant Position
	<div><p>Plate 22 Proposed CCC Area Site 28 (November 2020)</p></div>	<div><p>Plate 23 AMS Area Site 28</p></div>

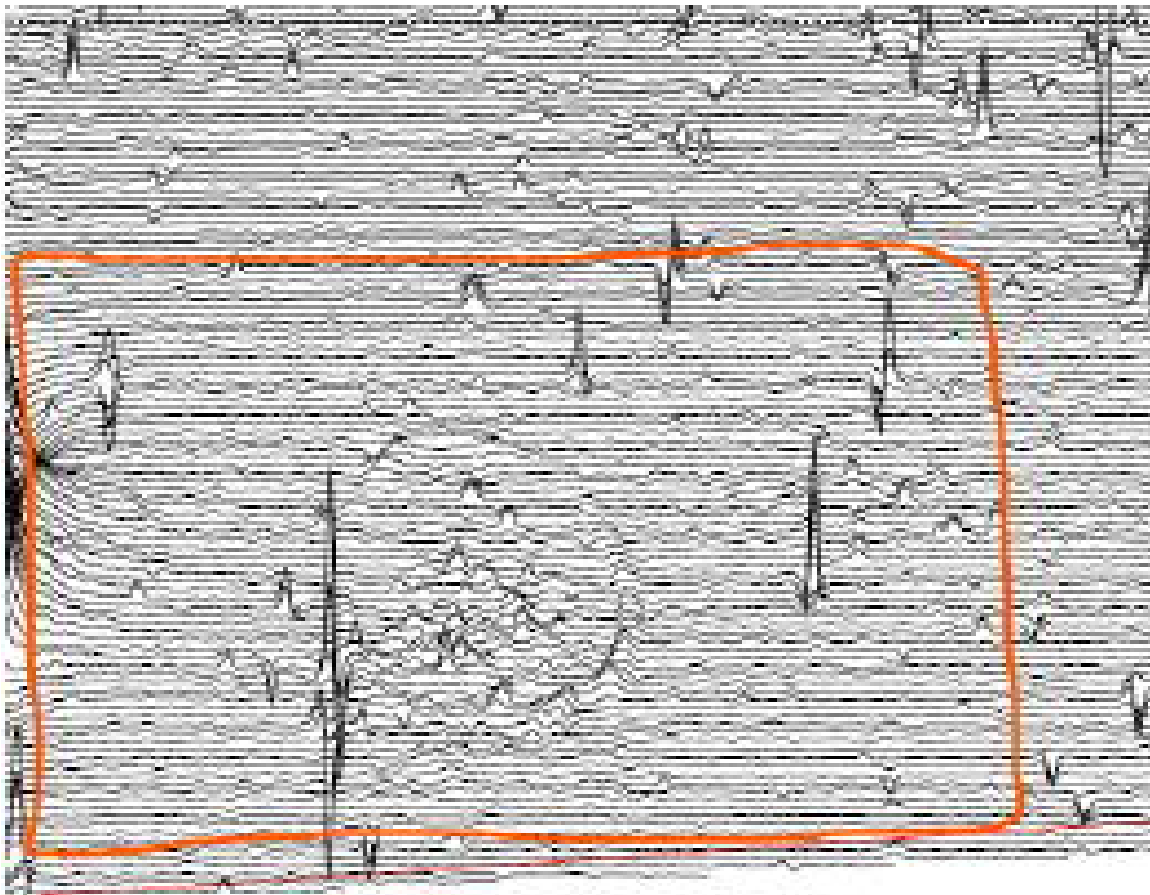
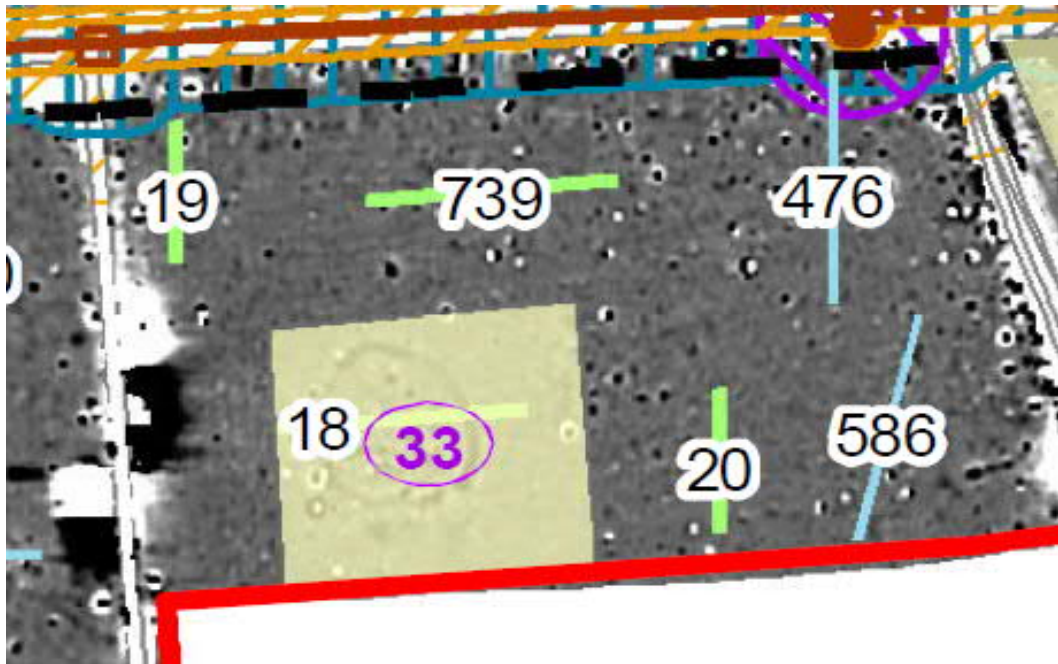
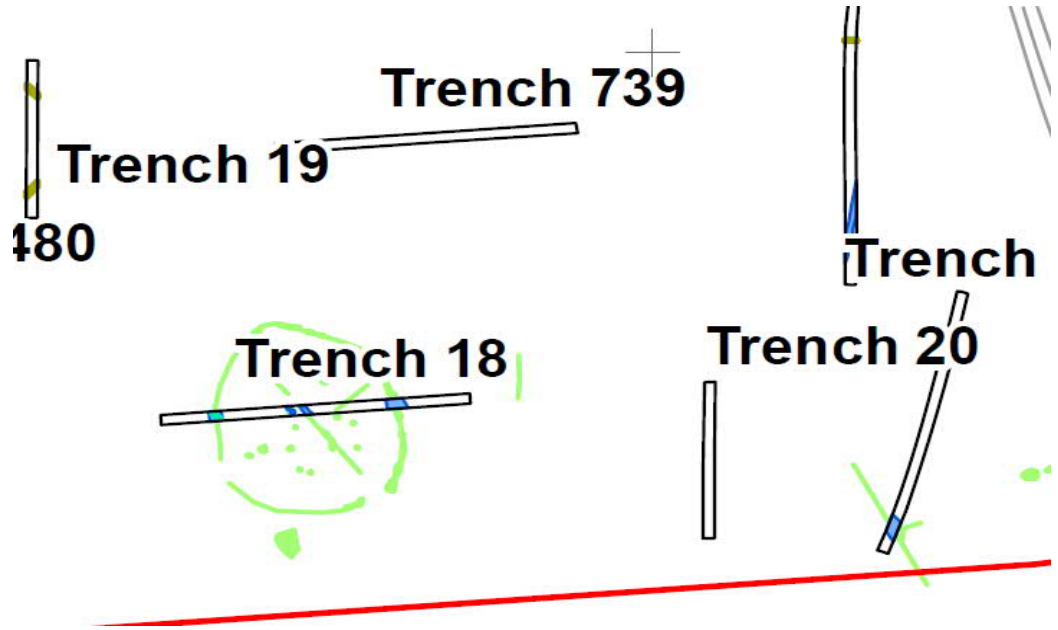


Site Number and Field Number	CCC Position	Applicant Position
	<div></div> <p>Plate 24 Proposed CCC Area Site 28 (Extension October 2021)</p>	<div></div> <p>Plate 25 Trenching Results at Site 28, Field 90</p>

Site Number and Field Number	CCC Position	Applicant Position
Site 32, Field 94	Group Value category b is approved. The excavation box shown in Appendix D is not: it requires extending southwards to encompass further contemporary evidence and test the geophysical anomalies.	There is no justification to extend this area. Trench 15 to the east contained only furrows, as did Trenches 17, 734 and 733 to the south. Trench 414 to the west also contained only furrows. We are therefore confident that we have captured remains associated with the enclosures. All geophysical anomalies identified on the geophysical survey in this area are included within the mitigation area. The site is being considered for its group value and association with other Middle Iron Age and later sites to the east (Sites 33-39).

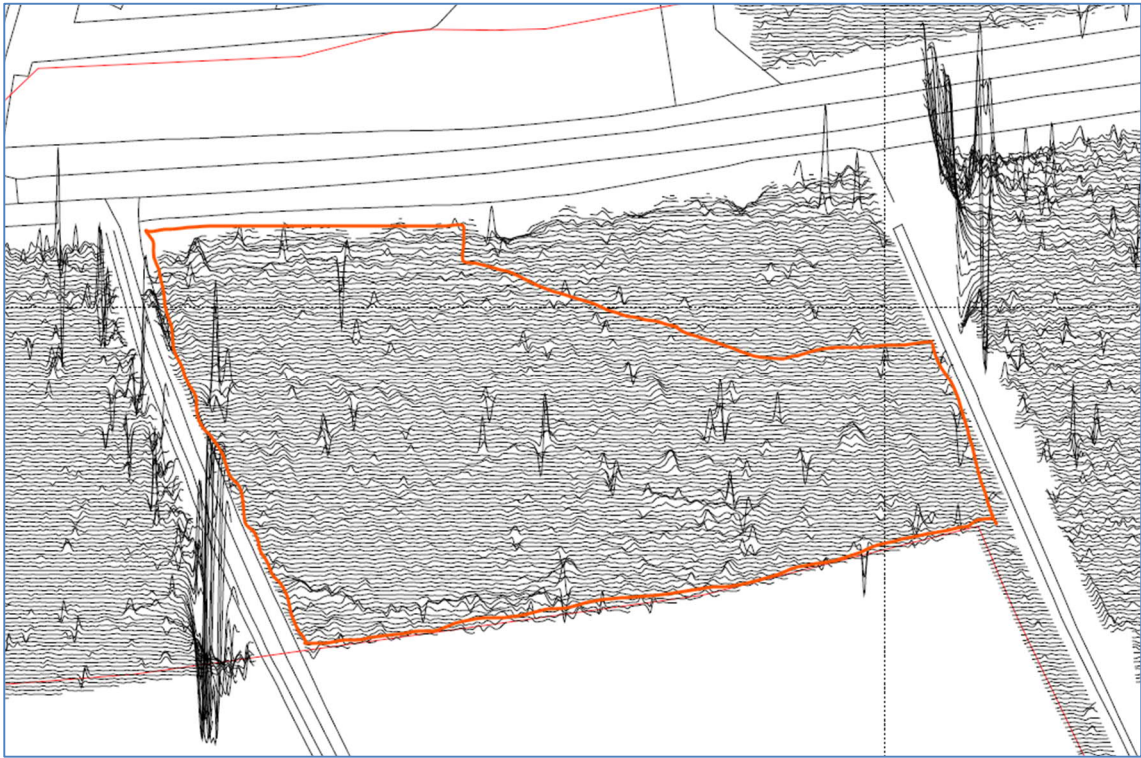
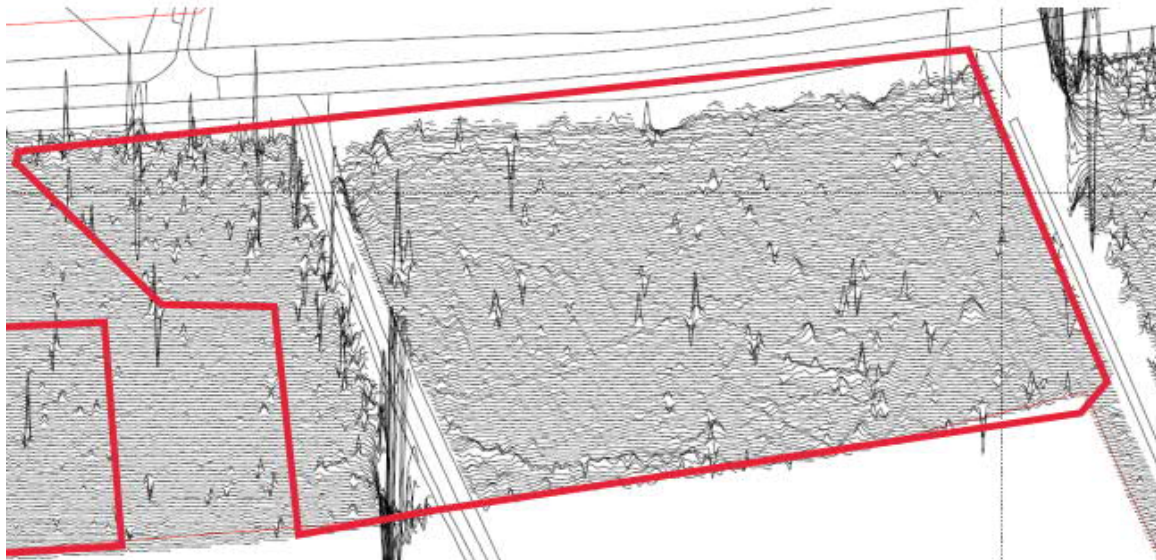
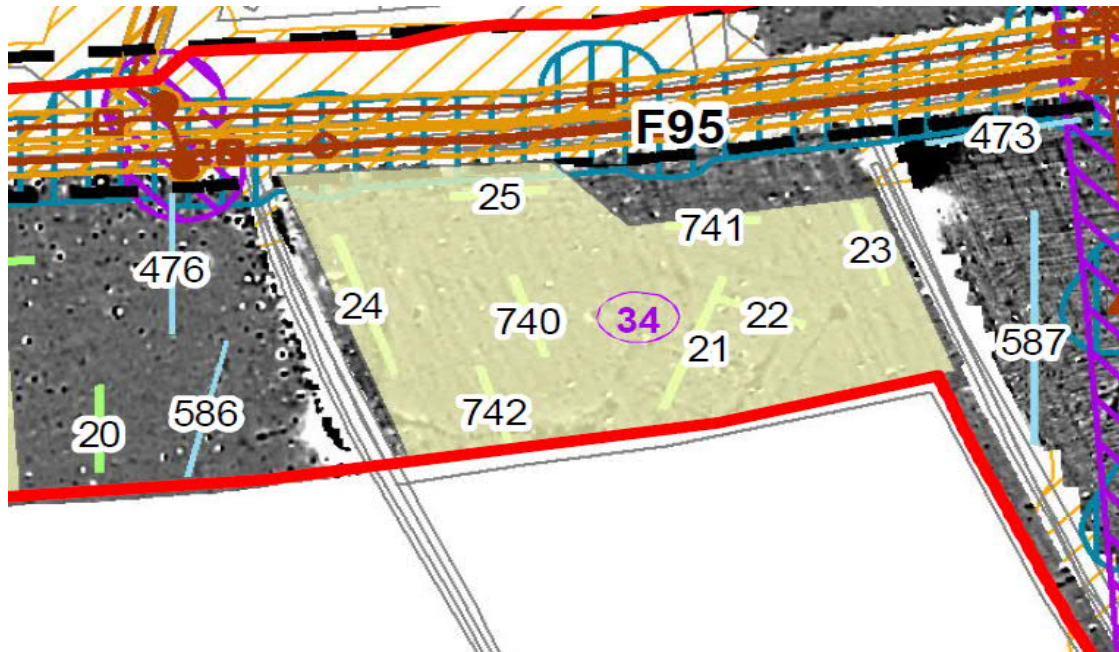
Site Number and Field Number	CCC Position	Applicant Position
	<div></div> <p>Plate 26 Proposed CCC Area Site 32</p>	<div></div> <p>Plate 27 AMS Area Site 32</p> <div></div> <p>Plate 28 Trenching Results at Site 32, Field 94</p>
Site 33, Field 94	Only the maplet in Appendix D is not approved as it is too tight to the Iron Age circular enclosure. It requires widening in all directions to enable geophysical anomalies around the enclosure to be investigated.	There is no justification to extend this area. Trench 19 contained only furrows and Trench 739 to the north did not contain any archaeology, and neither did Trench 20 to the east. We are confident that we have captured remains associated with the enclosure. All geophysical anomalies identified on the geophysical survey in this area are included within the mitigation area. The strategy is to strip



Site Number and Field Number	CCC Position	Applicant Position
	 <p>Plate 29 Proposed CCC Area Site 33</p>	<p>and excavate an area of 0.37ha that incorporates the enclosure measuring 0.09ha that contains a number of features that will be investigated.</p>  <p>Plate 30 AMS Area Site 33</p>  <p>Plate 31 Trenching Results at Site 33, Field 94</p>


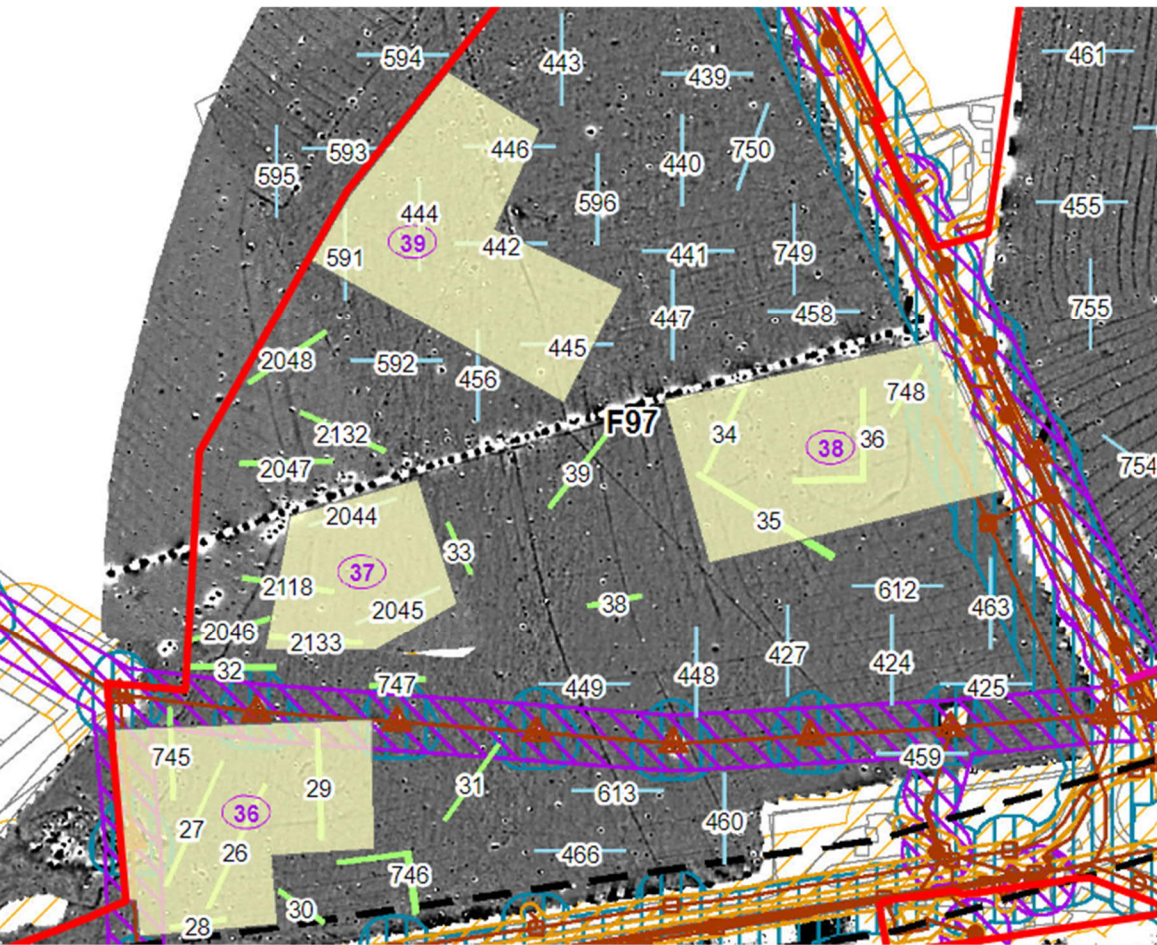
Site Number and Field Number	CCC Position	Applicant Position
Site 34, Fields 95 & 96	<p>Not approved.</p> <p>There is a major mapping error for this site at the east end of the scheme north of the Scheduled Monument Pastures Farm (NHLE 1019177). Despite the description indicating that the archaeological site is located in two fields on the south side of Cambridge Road, the maplet shows only one excavation area (in Field 95) that should cover the whole field within the Order Limits.</p> <p>The second area in Field 96 is entirely missing. This should extend to cover the parallel ditches bounding the enclosures into Field 96 that extend SE to contemporary remains. They appear to be roadside ditches and may have a relationship with Ermine Street Roman Road on the east side of the field.</p> <p>Also omitted are the multiple parish boundary ditches in the north part of the field that proved difficult to excavate in the wet conditions of February 2020. The examination of the antiquity of parish boundary features and their reestablishments should be included in the research objectives list.</p>	<p>The area to be fenced off in Field 96 is missing and the map will be updated. This will be included in an updated AMS submitted at Deadline 4 [TR010044/EXAM/9.23 v2]. The majority of the archaeological remains in this field is within the southern part of the field. This was originally proposed for diversion of overhead lines – this is no longer needed. This has previously been communicated to CCC.</p> <p>It is not clear which parallel ditches CCC are referring to. We believe that these are in the area to be fenced off.</p> <p>The parish boundary was excavated in Trenches 464 and 465 and a plan of its alignment drawn in Trenches 472 and 473. This concluded:</p> <p>“The former parish boundary between Caxton and Papworth Everard was parallel to the present A428 road at the north end of Field 96 and was present in Trenches 464, 465, 472 and 473... The ditch was up to 1.4m wide by 0.6m deep and was U-shaped in profile with a tapered rounded base. Approximately 500m of the parish boundary is within the field, as identified through geophysical survey. The parish boundary is marked on the Old Series First Edition Ordnance Survey map of 1805 and on later OS maps, including the 1887, 1:2500 scale County Series maps for Cambridgeshire and Huntingdonshire. No finds were present in the ditch so the origins of the boundary cannot be traced earlier than the beginning of the 19th century. However, it is probably older than this.”</p> <p>Based on this evidence it is not apparent that any further information would be gained.</p> <p>Note that the area of Field 95 was extended to match the area requested by CCC on 15 October 2020. CCC later asked for a further amendment to cover the entire field on 4 November 2020 without clear reasoning. There is no justification to extend this site, based on the excavation results where the parish boundary was investigated during the evaluation and that no further information will be gained from further excavation.</p>




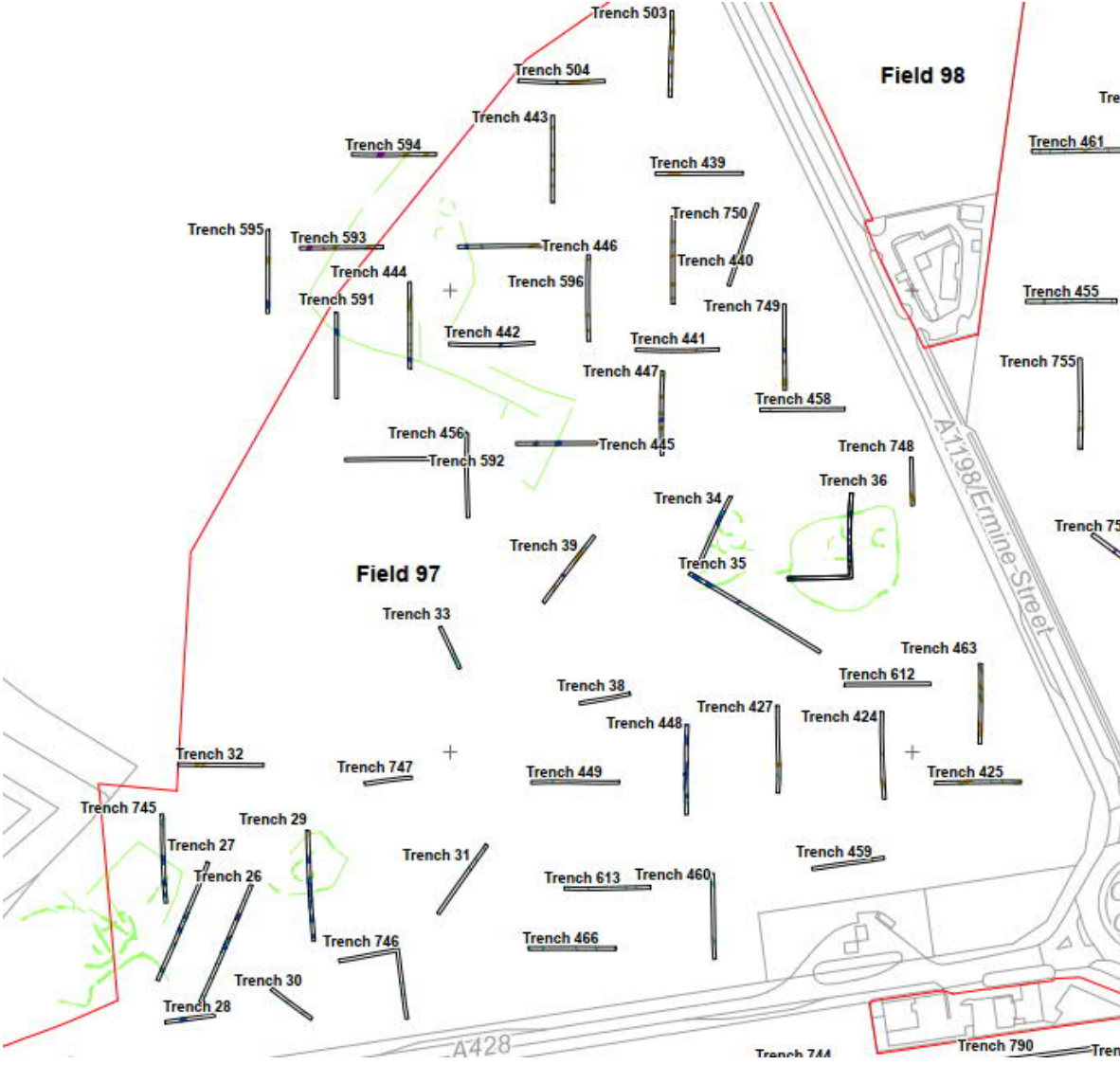
Site Number and Field Number	CCC Position	Applicant Position
	<div data-bbox="442 365 1507 1073"></div> <div data-bbox="620 1087 1326 1121"><p>Plate 32 Proposed CCC Area Site 34 (15th October 2020)</p></div> <div data-bbox="433 1150 1513 1673"></div> <div data-bbox="614 1686 1332 1719"><p>Plate 33 Proposed CCC Area Site 34 (4th November 2020)</p></div>	<div data-bbox="1617 359 2662 968"></div> <div data-bbox="1979 982 2306 1014"><p>Plate 34 AMS Area Site 34</p></div>

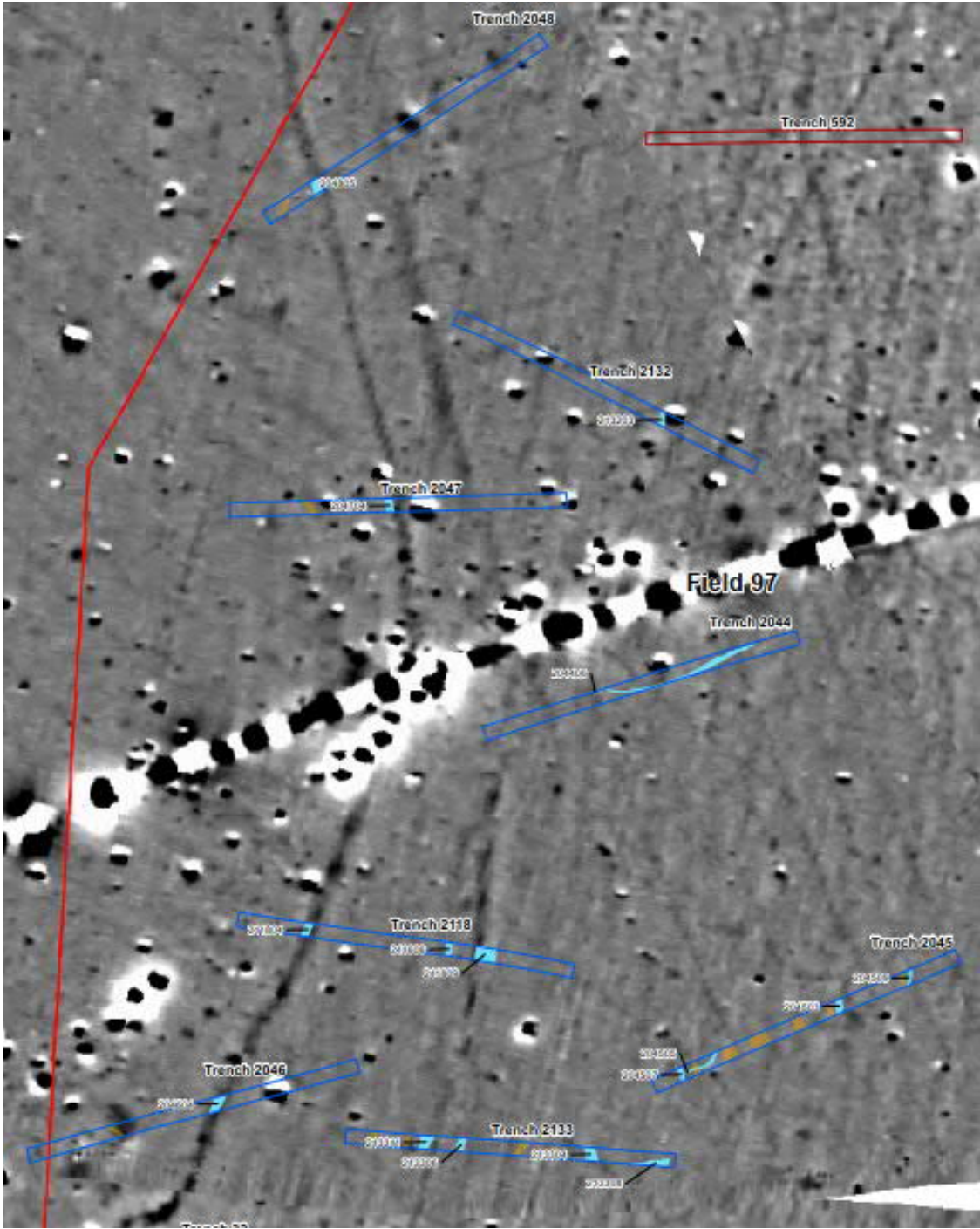
Site Number and Field Number	CCC Position	Applicant Position
Site 36, 37 & 39, Field 97	<p><u>Site 36</u> Not approved.</p> <p>When viewed against the geophysical survey results, the maplet in Appendix D for this site shows an excavation box that seeks to avoid archaeological features to the north and northeast, including the parish or hundred boundary. This requires modification to enable it to be fit for the purpose of the archaeological examination of known Iron Age remains, partly truncated by a pond lying just outside the DCO boundary, around which further archaeological evidence can be anticipated owing to the orientation of the known archaeological evidence that heads towards Site 34 in Field 95. The excavation box should, therefore, also extend south to the north boundary of the Cambridge Road.</p> <p><u>Site 37 Field 97</u> Not approved.</p> <p>The parish boundary adjacent to and the west side of the DCO boundary and within the borrow pit area has been avoided by the proposed excavation box.</p> <p><u>Site 39 Field 97</u> Not approved.</p> <p>This site areas form a continuum with the Iron Age settlements in this area around Caxton Gibbet. The site area selected for excavation is tight to the geophysical anomalies of enclosed settlement form that are not well understood and prevents a wider view of activities that can be expected outside the settlement core particularly relating to unenclosed occupation activity. The maplet for this site in Appendix D should be redrawn to widen the area to the northeast and south west.</p>	<p>For all sites within Field 97 there is no justification to extend the areas. The mitigation sites have been placed where there is archaeological evidence. The mitigation areas within Field 97 have been based on the results of the various phases of evaluation, including desk-based research, analysis of aerial photographs and LiDAR, geophysical survey, and evaluation excavation. There were 57 trenches excavated across this field. The evaluation evidence demonstrates that the geophysical survey was accurate, with the features identified on the geophysical survey and on aerial photographs located during the evaluation trenching. Furthermore, the areas between the enclosures are largely blank of features. There are seven trenches outside of the mitigation areas which contained archaeological features. All of these features were post-medieval in date, with one undated ditch located. The parish boundary was identified in three trenches which, where excavated, contained a modern land drain at its base.</p> <p>The parish boundary was sampled in the evaluation. The evaluation report (see Appendix 6-8, <b>[APP-176]</b>) notes:</p> <p>“The boundary between the parishes of Papworth Everard and Yelling was excavated in T2046 and T2048 and also recorded in T2047 and T2118 (Image 10). Though the parish boundary may have been marked by an earlier feature, this boundary survived as a ditch c1m wide and up to 0.65m deep, with a large ceramic drain at the base. Which [sic] had presumably removed any earlier iterations of the boundary. Pottery dating between 1790 and 1830 was recovered during Phase 1, and the boundary existed into the 20th century, recorded on OS mapping.”</p> <p>There is no evidence of an earlier boundary. While there are various iterations of the boundary shown on the geophysical survey, there is no surviving sub-surface evidence. A section through the parish boundary can be seen on Plate 40.</p>




Site Number and Field Number	CCC Position	Applicant Position
	 <p data-bbox="546 1459 1403 1493">Plate 35 Proposed CCC Area Site 19 36, 38 &amp; 39 (4th November 2020)</p>	 <p data-bbox="1952 1255 2332 1289">Plate 36 AMS Area Sites 36-39</p>



Site Number and Field Number	CCC Position	Applicant Position
	 <p>Plate 37 Proposed CCC Area Site 36-39 (16th February 2021)</p>	 <p>Plate 38 Trenching Results at Field 97 Sites 36, 38 &amp; 39</p>

Site Number and Field Number	CCC Position	Applicant Position
		<div></div> <p>Plate 39 Trenching Results at Field 97 Site 36</p>



Site Number and Field Number	CCC Position	Applicant Position
		<div></div> <p>Plate 40 Photograph of parish boundary containing a modern drain, Field 97</p>



## 4 Conclusion

- 4.1.1 This document details the Applicant's response to CCC's comments on the archaeological mitigation areas. CCC's comments on each mitigation area were presented, along with the Applicant's justification for maintaining the mitigation areas, as presented in the Updated Archaeological Mitigation Strategy **[TR010044/EXAM/9.23v2]**.
- 4.1.2 The information presented details the Applicant's reasons why there is no justification on archaeological grounds to extend the mitigation areas or change the excavation methodologies as presented by CCC.