

A303 Amesbury to Berwick Down

TR010025

Deadline 7

**8.3(1) - Statement of Common Ground – Historic Buildings
and Monuments Commission for England
(Tracked Changes)**

APFP Regulation 5(2)(q)

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

August 2019



Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Examination Procedure)**Rules 2010****A303 Amesbury to Berwick Down****Development Consent Order 20[**]**

**STATEMENT OF COMMON GROUND – Historic Buildings and
Monuments Commission for England**

Regulation Number:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	TR010025
Application Document Reference	8.3(1)
Author:	A303 Amesbury to Berwick Down Project Team, Highways England and Historic England

Version	Date	Status of Version
Rev 0	03.05.2019	Deadline 2 Issue
Rev 1	09.08.2019	Deadline 7 Issue

STATEMENT OF COMMON GROUND

This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Historic Buildings and Monuments Commission for England.

Signed.....

[NAME]

Project Manager

on behalf of Highways England

Date: **[DATE]**

Signed.....

Andrew Wiseman**[NAME]**

General Counsel and Corporate

Secretary**[POSITION]**

on behalf of Historic Buildings and
Monuments Commission for England

Date: **[DATE]**

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1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground ("SoCG") has been prepared in respect of the proposed A303 Amesbury to Berwick Down ("the Application") made by Highways England Company Limited ("Highways England") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.2 The order, if granted would authorise Highways England to carry out the following works:
- A northern bypass of Winterbourne Stoke with a viaduct over the River Till valley;
 - A new junction between the A303 and A360 to the west of and outside the WHS, replacing the existing Longbarrow roundabout;
 - A twin-bore tunnel approximately 2 miles (3.3km) long, past Stonehenge; and
 - A new junction between the A303 and A345 at the existing Countess roundabout.
- 1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available at the deposit locations and/or the Planning Inspectorate website.
- 1.1.4 The SoCG (HE/HBMCE SoCG-4) has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.
- 1.1.5 Unless otherwise stated, the facts set out in this SoCG are agreed between the parties to it. Facts and opinions that are not stated are not agreed and will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of agreement or disagreement between the parties.
- 1.1.6 The SoCG records the current position for Deadline 27 on relevant issues of fact in respect of the Scheme described in the firstfourth draft of the Development Consent Order (~~October 2018~~ July 2019). Unless a matter is stated as agreed, it cannot be taken to be as agreed. This first edition of the SoCG for Deadline 27 does not constitute the whole or entire body of agreement or disagreement between the parties as further relevant issues continue to be sought to be agreed on existing and further submitted information, between the parties within the Examination period.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Highways England as the Applicant and (2) Historic Buildings and Monuments Commission for England (HBMCE).
- 1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of the Highways Agency to be conferred upon or assumed by Highways England.
- 1.2.3 The Historic Buildings and Monuments Commission for England is generally known as “Historic England⁴”. HBMCE was established under the National Heritage Act 1983 and is the lead body for the heritage sector and the Government’s principal adviser on the historic environment. It is a statutory consultee on all Nationally Significant Infrastructure Projects. HBMCE administers the consent system for Scheduled Monument Consent on behalf of its sponsoring department the Department for Digital, Culture, Media and Sport (DCMS), and also advises DCMS who acts on behalf of Government as State Party on meeting and complying with the requirements of the 1972 Convention Concerning the Protection of the World Cultural and National Heritage.

1.3 Terminology

- ~~1.3.1~~ In the tables in the Issues chapters of this SoCG “Not Agreed” indicates a final position and “Under discussion” indicates where these points will be the subject of on-going discussion between the parties with the aim, wherever possible, to resolve, or refine, the extent of disagreement between the parties. “Agreed” indicates where the issue has been resolved.-

⁴ Prior to 1 April 2015 HBMCE was informally known as English Heritage. On 1 April 2015 the identity of HBMCE remained the same and there was no change in its statutory remit, but its informal name was changed to Historic England.

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2 Record of Engagement

- 2.1.1 A summary of the meetings and correspondence that has taken place between Highways England and HBMCE in relation to the preparation of this Statement of Common Ground is outlined in table 2-1.
- 2.1.2 In addition to the specific meetings listed in table 2-1, HBMCE is also a member of, and attends ~~regular~~ meetings of the following groups, that ~~were~~are also attended by Highways England, to participate in iterative discussion on heritage matters within HBMCE's remit:
- Stakeholder Strategy Board;
 - Heritage Monitoring and Advisory Group (HMAG);
 - Scientific Committee;
 - UNESCO World Heritage Committee Engagement Group;
 - Environmental Group;
 - Communications Group;
 - Benefits Steering Group; and
 - Attendance at regular Heritage Partners Meetings concerning the A303 iterative design progress reviews held by Highways England.
- 2.1.3 All of the regular meetings associated with the above groups in relation to the Scheme are not detailed here.

Table 1-1 – Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
20 April 2018	Public Consultation response	Response to public consultation on proposed route.
14 August 2018	Supplementary Consultation response	Response to supplementary consultation on Scheme design changes.
13 December 2018	Meeting	Meeting at the Wiltshire and Swindon History Centre to discuss the Statement of Common Ground.
10 January 2019	HBMCE Relevant Representation to PINS	HBMCE register as an Interested Party; HBMCE submit Relevant Representation to PINS.
6 February 2019	Meeting	Meeting at Highways England Offices, Temple Quay House, Bristol to discuss the Statement of Common Ground.
30 April 2019	Meeting	Meeting at Highways England Offices, Temple Quay House, Bristol to discuss the Statement of Common Ground.
<u>15 May 2019</u>	<u>Meeting</u>	<u>Meeting at Historic England Offices, Queen Square, Bristol to discuss the Statement of Common Ground.</u>

<u>28 May 2019</u>	<u>Meeting</u>	<u>Meeting at AECOM's Offices, Portwall Place, Bristol to discuss updating the draft Statement of Common Ground.</u>
<u>18 June 2019</u>	<u>Meeting</u>	<u>Meeting at AECOM's Offices, Portwall Place, Bristol to discuss updating the draft Statement of Common Ground.</u>
<u>25 July 2019</u>	<u>Telecon</u>	<u>Telecon to discuss the Statement of Common Ground.</u>
<u>30 July 2019</u>	<u>Telecon</u>	<u>Telecon to discuss key issues and proposals for their resolution.</u>
<u>1 August 2019</u>	<u>Meeting</u>	<u>Meeting at Highways England's Bristol office to discuss the draft DCO.</u>

2.1.1 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Highways England and (2) HBMCE in relation to the issues addressed in this SoCG.

3 Matters Agreed

Table 3-1 Matters Agreed

Issue Ref	Doc Ref	Paragraph Reference	Sub-section	HBMCE Comment	Highways England Response	Status
3.1	[RR-1897]	Page 1	<u>Relevant Representation</u> Current Position	<p>HBMCE states that the existing A303 trunk road has a substantial adverse impact on the Outstanding Universal Value (OUV) of the WHS and they accept the need to improve the road between Amesbury and Berwick Down.</p> <p>HBMCE have engaged with Highways England and other stakeholders to encourage a scheme which delivers benefits to the historic environment while avoiding and minimising adverse impacts. This applies particularly to the Stonehenge component of the WHS and the many other designated heritage assets, together with their settings, within and adjacent to the development limits.</p> <p><u>HBMCE support the aspirations of the road scheme proposed in the DCO and believe that it offers the potential to deliver a beneficial outcome for the historic environment and to sustain and enhance the OUV of the WHS, by putting much of the current surface road into a bored</u></p>	<p>Highways England acknowledges HBMCE's comments in relation to the substantial adverse impact that the existing A303 has on the Outstanding Universal Value (OUV) of the WHS and also the need to improve the road between Amesbury and Berwick Down. Highways England agrees that there has been much engagement with HBMCE and other stakeholders in the development of the scheme, a summary of which is presented in the Consultation Report [APP-026], Chapters 2 and 3. <u>This continues through the channels set out in section 2 above.</u></p> <p><u>The need for a number of matters to be addressed is understood by Highways England will continue and is reflected in this SOCG, which demonstrates the significant progress that has been made and the steps that are being taken to reach agreement on the resolution of those matters outstanding.</u></p>	Agreed

				<p><u>tunnel and allowing archaeological features currently separated by the A303 to be appreciated as part of a reunited landscape. However, if this potential is to be realised in practice we believe it is essential for a number of matters to be addressed satisfactorily.</u></p>	<p><u>Highways England continues to engage with HBMCE, and other heritage stakeholders, on relevant Scheme matters. Engagement will continue through the Scheme's construction and into operation.</u></p>	
3.2	[RR-1897REP02-100]	Page-2 Paragraph 1.16 and 1.17	<p><u>Deadline</u> Current Position</p>	<p>HBMCE supports the <u>concept (i.e. the aspirations) of the</u> road scheme proposed and considers that the <u>Scheme (as presently articulated in the DCO and believes that it offers the)</u> has potential to <u>actually</u> deliver a beneficial outcome for the historic environment and helping to sustain and enhance the <u>Outstanding Universal Value (OUV) of the WHS,</u> by putting much of the current surface road into a bored tunnel and allowing archaeological features currently separated by the A303 to be appreciated as part of a reunited landscape.</p> <p>However, if this potential is to be realised in practice, HBMCE believes it is essential for that a number of matters to be addressed <u>are</u> satisfactorily addressed, such as set out by <u>inclusion of the terms of appropriately worded Protective Provisions, Requirements, and measures, as part of the DCO. This is so that the relevant and important elements of the currently illustrative</u></p>	<p>Highways England acknowledges the support of HBMCE Historic England for the aspirations of the road scheme proposed in the <u>DCO draft development consent order [REP2-003].</u> Highways England acknowledges HBMCE's Historic England's statement that the scheme <u>Scheme</u> offers the potential to deliver a beneficial outcome for the historic environment and to sustain the OUV of the WHS.</p> <p>Highways England will continue to engage with HBMCE, and other heritage stakeholders, on relevant Scheme matters.</p>	Agreed

				<p><u>scheme that has been assessed by the Environmental Impact Assessment and HIA can be appropriately ensured to be executed in the other RR issues line with those assessments, and, thereby, ensure delivery of the stated aspirations and objectives.</u></p>		
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4 Matters Under Discussion

Table 4-1 Matters Under Discussion

Issue Ref	Doc Ref	Paragraph Reference	Sub-section	HBMCE Comment	Highways England Response	Status
4.1	{RR-1897}	Page 2	Detailed Archaeological Mitigation Strategy (DAMS) & <u>Overarching Written Scheme of Investigation</u> <u>Outstanding Matters</u>	<p>HBMCE request the <u>detailed archaeological mitigation strategy (DAMS)</u>. Historic England request an <u>Overarching Written Scheme of Investigation to accompany the DAMS</u>.</p> <p><u>As part of the Written Representation submitted by HBMCE [REP2-100], it was stated that the ‘Scheme represents a unique opportunity to explore a linear transect through this landscape, for which the development of an informed, nuanced, structured and iterative strategy for the programme of archaeological mitigation is required, rooted in a heritage research-led</u></p>	<p>A<u>The draft</u> Detailed Archaeological Mitigation Strategy (DAMS) is being<u>has been</u> developed in consultation with <u>HBMCE</u>, Wiltshire Council Archaeology Service and <u>other members of</u> the Heritage Monitoring and Advisory Group (, with inputs from the Scientific Committee, which includes HBMCE). Initial discussions on the sets out the structured, iterative detailed archaeological mitigation strategy. <u>The DAMS have commenced with our Heritage Partners and is rooted in a heritage research-led framework [draft DAMS submitted at Deadline 6, [REP6-013 Section 4].</u></p> <p>- <u>The draft DAMS was submitted to the Examination for the second deadline (DL2) [REP2-038]. Comments made</u></p>	Under Discussion
	[REP2-100]	Page 129	Paragraph 8.8(k)			

	<p>[REP3-054]</p>	<p>Page 7</p>	<p>Paragraph 1.16</p>	<p><u>framework.’ It continues ‘We consider it essential that the results of evaluation work (both intrusive investigation and geophysical survey) are amalgamated with a comprehensive assessment of previous archaeological work in the SAAS WHS to inform the development of the Detailed Archaeological Mitigation Strategy (DAMS);-) to be employed across the Scheme in tandem with the Overarching and subsequent, subordinate, Site Specific WSIs (OWSI and SSWSIs). At all times the strategy must identify an approach that is proportionate to the importance of the archaeological remains affected and the impact upon them (NPSNN 5.140). The international importance of the World Heritage Site and the iconic status of Stonehenge itself (Attribute 1 of OUV) set a high bar for such work.’</u></p> <p><u>Further comment was made in the HBMCE Comments on Current Iteration (Draft 3) of the “Detailed Archaeological Mitigation Strategy [REP3-054], which noted that ‘As can be seen from the above, work is continuing on developing the DAMS and HBMCE welcomes the work that has been done so far. We anticipate further work from Highways England before we will be in a position to properly advise on the adequacy of the dDAMS and its relationship with the dDCO.</u></p>	<p><u>by HBMCE at deadline 3 were included in the draft DAMS submitted at Deadline 4 [REP4-024]. The draft DAMS has been further revised and submitted at Deadline 6 [REP6-013] and forms the basis for continued discussion. A further update of the DAMS is to be issued at deadline 7 which will address comments received at deadlines 5 and 6.</u></p> <p><u>The DAMS will be ongoing throughout the Examination process in order to finalise the document. The DAMS is and will be secured by Requirement 5 under Schedule 2 of the draft Development Consent Order (DCO) [APP-020]. The draft DAMS will be submitted into the Examination for the second deadline: REP6-005].</u></p> <p><u>With regard to the process and parameters for decision making, the DAMS confirms documents to be consulted upon, as well as process, within sections; 5.1, 6.1, 8.4 and 8.5. Further clarification is provided within the OEMP [REP6-011].</u></p>	
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	<p><u>Current position Statement</u></p>		<p><u>Although detailed work remains required, we are optimistic that with continuing discussions with Highways England it may develop its current document in an appropriate manner for the Scheme.'</u></p> <p><u>The Detailed Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (OWSI) which form the two main component parts of the DAMS make this a key document providing the overarching basis for the approach to archaeological mitigation that will be implemented across the Scheme and an overarching WSI which will directly inform the content of the 56 site specific WSIs. We have been working closely with Highways England on this key document and those discussions are going well – the latest iterations of the DAMS are much improved. Positive discussions are continuing with weekly meetings, and Highways England to date has continued to address our recommendations through producing revisions to the DAMS. However, further work is still required to ensure that the process and parameters for decision making under the DAMs are unambiguous and meet the requirements of national policy and guidance and international obligations. We consider Highways England need to provide a revised version of the DAMS by 9th August which we can review and</u></p>		
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				<u>provide any further comments on in advance of 6th September deadline set by the ExA for receipt of a final version.</u>		
4.2	<u>[RR-1897]</u>	Page 2	Overarching Written Scheme of Investigation (OWSI)	HBMCE request an Overarching Written Scheme of Investigation to accompany the DAMS;	The Overarching Written Scheme of Investigation is part of the DAMS, and is therefore being consulted on with HMAG.	Under Discussion
4.32	<u>[REP2-100]</u>	Page 2 'Management of the Scheme'	Outline Environmental Management Plan (OEMP) Paragraphs 7.6.123 – 131	<p>HBMCE requests a Preliminary Outline Environmental Management Plan for preliminary works including archaeological mitigation. The Applicant's response to the S51 advice indicated that the REAC table 3.2a of the OEMP provided specific measures to apply to works. However, this contains insufficient detail given the very high sensitivity of the proposal.</p> <p><u>Within the Written Submission at Deadline 2 [REP2-100], it is stated that HBMCE is concerned that the proposal is for all management plans, detailed schemes (including WSIs) and method statements implemented in relation to the OEMP to be approved by Highways England (ES Appendix 2.2, 1.1.10 (a); Table 2.1; Tables 3.2a,b). HBMCE do not consider that it is appropriate for Highways England to act as the sole Authority in relation to approval of matters pertaining to the preservation of scheduled monuments given our statutory remit.</u></p>	<p>The REAC table 3.2a of the Outline Environmental Management Plan (OEMP) and the Outline Archaeological Mitigation Strategy (OAMS) have <u>has</u> been submitted as part of the DCO application, and provide <u>provides</u> sufficient information for the decision-making process at this stage and to allow ongoing consultation and comment on the Scheme with <u>members of</u> HMAG. Implementation</p> <p><u>An update of the OEMP has since been submitted at Deadline 6 [REP6-011]. Document [REP6-012] confirms changes made to the OEMP in response to comments received at deadlines 4 and 5.</u></p> <p><u>Preliminary works will not commence until DCO approval for the whole scheme is received. Through the funding statement submitted with the application and in response to questions of the Examining Authority</u></p>	Under Discussion

	<p><u>[REP4-086]</u></p>	<p><u>Comments on OEMP submitted at Deadline 3</u></p>	<p><u>Whole document</u></p>	<p><u>Comments on the OEMP submitted at Deadline 4 [REP-086] complemented the Written Submission and focused on the relationship of the OEMP with the DAMS, the format of the Record of Environmental Actions and Commitments (REAC) tables, the significant inclusion of Section 4 on the development of detailed design, the need for [an] overall vision for the Scheme, how the OEMP can further actively engage with the core objective of cultural heritage, archaeological mitigation and the issue of consultation and sign off.</u></p> <p><u>Within the summary of oral submissions at Issue Specific Hearings [REP4-085], it was continually noted that comments had been provided at various deadlines and that there was continued discussions with Highways England over the form and content of the OEMP.</u></p> <p><u>Some of the issues we raised in relation to the d2DCO intersect with the development of the DAMS and the OEMP as well as other documentation being produced under the Scheme. The resolution of these issues requires a number of different discussions to draw to a conclusion. The discussions have</u></p>	<p><u>it has been demonstrated that the Scheme has the necessary funding to allow the Scheme to be delivered once approved. As a consequence, there is no risk of archaeology being undertaken and the Scheme not being taken forward subsequently.</u></p> <p><u>Taking information from the OEMP, a matrix/ hierarchy setting out the various documents to be created, when they will be available, who will be consulted on their content and the process for consultation has been shared with the members of HMAG. A workshop is to be convened in the immediate future to allow a detailed discussion to take place. A date for this workshop is being sought ahead of hearings scheduled for mid/ late August.</u></p> <p><u>Discussions are ongoing with HBMCE and will be ongoing throughout the Examination process in order to resolve any outstanding concerns and finalise the OEMP and DAMS. The OEMP will be secured by paragraph under Requirement 4 of Schedule 2 of the draft DCO. Implementation of the OEMP is [REP6-006]. The DAMS will be secured by Requirement 4 under Schedule 2 of the DCO [APP-020]. A detailed Construction Environmental Management Plan (CEMP) will be</u></p>	
	<p><u>[REP4-085]</u></p>	<p><u>HBMCE Written summaries of oral submissions put at Issue Specific Hearings held between 4 and 14 June 2019</u></p>	<p><u>Sections 9-13, 15-19, 21-23.</u></p>			
	<p><u>[REP5-013]</u></p>					

	<p><u>Current Position</u> RR-1897]</p>	<p><u>An updated version of the DCO</u></p>	<p><u>Second paragraph</u></p>	<p><u>resulted in further clarification and revisions to the DAMS and similarly additional consultation on the Design Principles incorporated in the OEMP. We are working with Highways England regarding these documents in light of the updated versions being submitted on 26 July to incorporate as many of our comments as possible before this deadline. We will then review and provide the Examining Authority with commentary on the updated versions of these documents in due course.</u></p> <p><u>The OEMP should set out how the environmental effects of the Scheme will be managed, including through design mitigation during construction and operation. We would expect the OEMP to set out how the Scheme will address the range of detailed design issues that we raised in our Relevant Representations, comprising lighting, signage, fencing, drainage, balance ponds, landscaping including tree planting in and adjacent to the WHS; and then how the Scheme will address our comments regarding the construction-period temporary infrastructure and reinstatement of affected land post-construction.</u></p> <p><u>This document has been subject to revision and discussions, but further discussion is still required regarding the Design Principles and Design Commitments incorporated in the OEMP.</u></p>	<p><u>prepared by Highways England's appointed contractor which will be based on, and incorporate, the requirements of the OEMP, under Requirement 5 of the DCO [REP6-005].</u></p>	
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			<p><u>It is essential that these give us confidence that a scheme of the highest design quality can be delivered in practice, and that decision-making at the Detailed Design Stage will not deviate from the 'vision' for the scheme that ultimately these Principles and Commitments need to establish.</u></p> <p><u>The OEMP as currently drafted deals with both preliminary works and main works. We consider that there is inconsistency and a gap in how the preliminary works are dealt with in the OEMP and other documents, notably the draft legal document which will give the consent for the Scheme. This is then compounded by a risk that preliminary works (primarily comprising archaeological mitigation) might be undertaken in the expectation that the rest of the Scheme will follow, but it then does not take place. We would then have the prospect of a landscape that has been subject to extensive archaeological excavation, but no road scheme would follow.</u></p> <p><u>We consider that these points are critical to resolve.</u></p> <p><u>To this end we have requested that Highways England provide their matrix/hierarchy framework for the documents that will need to be approved before work commences on any part of the Scheme.</u></p> <p><u>We are also continuing to meet and discuss with Highways England in</u></p>		
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				<p><u>relation to ensuring that that the design principles will secure decision-making at detailed design stage that has the Department for Transport's cultural heritage objective at its core. We have requested that Highways England convene a workshop so that all relevant specialists from both Highways England and HBMCE can attend and detailed discussion can take place.</u></p>		
4.43	<p><u>[REP2-100]</u></p> <p><u>Current Position</u> <u>RR-1897]</u></p>	<p><u>Page-2</u> <u>Paragraph 1.12(a),</u> <u>7.5.1-3</u></p>	<p>Evaluation Reports</p>	<p>HBMCE request completed archaeological evaluation reports for the scheme. These are essential to a proper understanding of the archaeological impacts of the scheme and of the basis on which the DAMS has been drawn up. <u>In the written representation [REP2-100] Historic England stated that the DCO had been submitted before results of all the archaeological evaluation had been finalised.</u></p> <p><u>We are pleased to note that the issue we raised in our Relevant Representations and Written Representation regarding the submission of outstanding evaluation reports has been addressed. We are content to agree that reports have been submitted in relation to all the archaeological evaluation completed to date. We understand that Highways England intend to address our outstanding comments on the most recently submitted reports through the DAMS rather than revising those documents individually. We would</u></p>	<p>A full and comprehensive programme of archaeological evaluation surveys has been completed. <u>The archaeological evaluation and survey reports were submitted to the Examination on 12 April, as promised at the Preliminary Meeting (see Examination Library Reference [REP1-039] – [REP1-056]).</u> The completed archaeological evaluation reports have been developed in consultation with <u>HBMCE and Wiltshire Council Archaeology Service and together with other members of the Heritage Monitoring and Advisory Group, which includes HBMCE.</u> The results of the archaeological evaluations were considered for the submission of the ES [APP-044] and the HIA [APP-195]. The archaeological evaluation reports confirm the archaeological baseline and the approach to mitigation. These have been reviewed in line with the ES tables that detail the impacts and the significance of effects (Section 6.9 in</p>	Under Discussion

				<p><u>expect to see this in the 9th August submission. On that basis this element remains Under Discussion until a version of the DAMS has been submitted that addresses those comments to our satisfaction.</u></p>	<p>Chapter 6 and Appendix 6.8). No additional significant effects have been identified.</p> <p><u>Two further reports requested by HMAG, namely a short technical report relating to the Western Portal Approaches on charcoal and snails and an assessment of flint and tree throw distributions were provided to HMAG members (including HBMCE) prior to publication. These were submitted to the Examination at DL3 [REP3-023; REP3-024].</u></p> <p><u>The updated draft DAMS as submitted at Deadline 6 [REP6-013] includes a review of the archaeological evaluations in the context of previous work within the WHS to outline a research led framework for the archaeological mitigation works. A further update taking account of comments made at deadlines 5 and 6 is to be issued at deadline 7.</u></p>	
4.54	[RR-1897] [RR-1897]	Page 2	Detail of key elements of Infrastructure <u>and provision of visualisations</u>	<p>HBMCE states<u>HBMCE stated in the Relevant Representations [RR-1897]</u> that there is an absence of detailed proposals for design and visual representations for key elements of infrastructure within the WHS, including the western tunnel portal and its extension, the eastern tunnel portal, the articulation and form of open cutting retaining walls and the design,</p>	<p>Highways England considers the application is sufficiently detailed to allow HBMCE to understand and comment on the scheme. In particular photomontages and CGI visualisations have been presented within the LVIA Chapter (Chapter 7 [APP-045]) and Cultural Heritage Chapters (Appendix 6.9 [APP-218]) of the ES. Design and visual</p>	Under Discussion

	<p>[REP4-085]</p> <p><u>Current Position</u></p>	<p><u>Section 9.3, page 28</u></p>	<p><u>Paragraph 9.2.1</u></p>	<p>construction, form and appearance of Green Bridge 4;</p> <p><u>The Written summaries of oral submissions put at Issue Specific Hearings [REP4-85] confirmed that within the Written Representations HBMCE advised that it was essential that the complement of visualisations submitted demonstrated to the Examining Authority the full range of visual impacts on the OUV and experience of the Stonehenge WHS and the designated and non-designated heritage assets in that same landscape (Section 7.5.18). We welcome the further requests for additional visualisations from the Examining Authority, some of which were produced and submitted at Deadline 3.</u></p> <p><u>We are pleased to note that further visualisations have been submitted. However there remain some visualisations and design representations that we would like to see and understand that these will be submitted by 09 August. On that basis this element remains Under Discussion until visualisations have been submitted that address those comments to our satisfaction.</u></p>	<p>representations will be developed through the detailed design process.</p> <p><u>The further detailed design of the portal and its associated infrastructure will be sensitive to its WHS context, following Highways England's guide 'The Road to Good Design' and will be developed in consultation with the Heritage Monitoring Advisory Group, which includes HBMCE. HBMCE. The draft OEMP [REP6-011] has been updated in consultation with HBMCE to include a vision and design principles section and process for consultation in the development of detailed design.</u></p> <p><u>It should be noted that the photomontages are based on the Environmental Masterplan [APP-052] and therefore will not illustrate the Limits of Deviation, which are set out in Table 2.1 of Chapter 2: The Proposed Scheme [APP-040].</u></p> <p><u>With reference to Interim Advice Note 135/10 which forms the basis of the Landscape and Visual Impact Assessment [APP-045], static views are referred to as from a residential property (IAN135/10 paragraph 3.9). The ES photomontages (in both the LVIA and Cultural Heritage chapters) include representative static views from residential properties as well as</u></p>	
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					<p><u>key views for the historic environment. Kinetic views are also included in the LVIA as representative of people moving through the landscape, i.e. on Public Rights of Way or road networks.</u></p> <p><u>All the photomontages are produced for day time scenarios. Night time photomontages are not able to be produced due to technical limitations of photomontages and illustrating conditions in artificial lighting.</u></p> <p><u>Highways England has discussed with HBMCE the provision of additional visualisations and agreed a set of information which will be submitted at deadline 7.</u></p>	
4.6	[RR-1897]	<u>Page-2 Outstanding Matters</u>	<u>Detail of proposals for NMU Routes</u>	<p>HBMCE states that there is an absence of detailed proposals for proposed Non-Motorised User (NMU) routes, their articulation and form, and how they relate to sections of the A303 and A360 made redundant by the scheme; the removal of road infrastructure that will be made redundant by the scheme and the proposed reinstatement of land within the former highway boundary beyond that required for new NMU routes. There is also uncertainty about the relationship between the byways proposed by the scheme and the implications of the recent Experimental Traffic Regulation Order;</p>	<p><u>Highways England considers the application is sufficiently detailed to allow Historic England to understand and comment on the Scheme.</u></p> <p>The Scheme's proposals for changes to existing, or creation of new, public rights of way, as are shown on the Rights of Way and Access Plans [APP-009] and secured by the draft Development Consent Order [APP-020]. <u>The design of these elements of the scheme will be developed through the detailed design process in consultation with HBMCE.</u></p>	Under Discussion

	<p><u>REP2-100]</u></p> <p><u>[REP4a-008]</u></p> <p><u>Current Position</u></p>	<p><u>Executive Summary and Conclusion</u></p> <p><u>Historic England's Position on Highways England proposals</u></p>	<p><u>8.8(i)</u></p> <p><u>Paragraph 14</u></p>	<p><u>At Deadline 2, HBCME wrote in the Written Representation [REP2-100] that, 'Sufficient information is required to enable express parameters for the treatment and detailing of NMU routes and PROWs to be assessed and confirmed during the Examination. The assessment should show how the provision of wider public access across the SAAS WHS landscape can best be achieved with careful consideration of factors such as the extent, and nature of access and surfacing materials. This applies to both new PROWs and those stopped up as part of the Scheme.'</u></p> <p><u>At Deadline 4a HBCME wrote, 'What does not appear to be clear...and does not appear to have been shown on the Rights of Way and Access plans or other plans, nor is it shown where and how this turning facility will be provided. Nor does there appear to be any mention of the turning facility in any of the works noted in Schedule 1 to the DCO itself. It would be helpful to establish the proposed location and provision of this turning facility to be able to understand the implications that this would have for the historic environment.'</u></p> <p><u>As noted above, the OEMP remains the focus of discussion on the detail of the Scheme. We would expect the NMU articulation and form, how they relate to sections of the A303 and A360 made</u></p>	<p><u>NMU routes proposed by the Scheme</u> are entirely independent of Wiltshire Council's previously placed experimental Traffic Regulation Order (TRO). The permanent downgrading of Byways 11 and 12, should this outcome be achieved by Wiltshire Council, would have no foreseeable impact on the Scheme's PRoW proposals.</p> <p><u>No turning heads are proposed to byways 11 and 12 where they meet with the old A303. Highways England is currently consulting on the introduction of a turning head on Old Stonehenge Road as a non-material change to the DCO. This would be to the immediate south east of the point at which Stonehenge Road is turned into a new restricted byway. Consultation materials confirm the arrangement of the turning head. This consultation runs until 27 August.</u></p> <p><u>Section 4 of the OEMP [REP6-011] has been developed in consultation with HBMCE to set out how Highways England will involve key stakeholders, including HBMCE, in the detailed design of certain key aspects of the Scheme and, in Table 4.1, identifies key Design Principles which will inform the detailed design of the Scheme. Within Table 4.1 are</u></p>	
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				<p><u>redundant by the scheme; the removal of road infrastructure that will be made redundant by the scheme and the proposed reinstatement of land within the former highway boundary beyond that required for new NMU routes to be covered as part of this discussion.</u></p>	<p><u>multiple commitments in respect of public rights of way.</u></p> <p><u>Design Principles describe the common general overall goal or objective but are not intended to prescribe the precise means of achieving it. It is intended that these will be accompanied by guidance that outlines appropriate ways of achieving the goal. This guidance will take the form of:</u></p> <ul style="list-style-type: none"> <u>a) material palettes;</u> <u>b) examples of design typologies that are agreed to be inappropriate; and</u> <u>c) examples of design typologies that are agreed to be appropriate.</u> <p><u>The Design Principles approach is also coupled with stakeholder consultation on the development of the detailed design, to give confidence of a robust process that would be followed through from examination into detailed design and delivery.</u></p> <p><u>The existing road surface of the existing A303 and A360 would be reduced to a width of no more than 3m to provide a level surface for non-motorised users including those needing mobility aids, and those vehicles permitted to use the route such as agricultural and maintenance</u></p>	
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					<p><u>vehicles. It would be treated with a new visually recessive durable surface. The surplus areas of redundant road surface would be replaced by chalk grassland and existing roadside furniture and infrastructure (signage, lighting columns etc.) would be removed (this approach is described in section 2.3.56 (d) of the Environmental Statement (ES) [APP-040]. Other new NMU routes within the WHS (A360 north to the Stonehenge Visitor Centre; A360 South to Druids Lodge) would be of similar form and design and would be constructed at or just above existing ground level and would utilise a no-dig construction solution. There would be no new street furniture adjacent to the new NMU routes and public rights of way.</u></p> <p><u>The new public rights of way measures proposed along the Scheme would not only maintain, but would also considerably enhance the existing PRoW network, significantly improving connectivity for non-motorised users, see the Rights of Way and Access Plans [APP-009].</u>The design of these elements of the scheme will be developed through the detailed design process in consultation with HBMCE.</p>	
4.7	[RR-1897]	<u>Page 2 Detail of key engineering</u>	Detail of proposals for	HBMCE states that there is an absence of detailed proposals for lighting, signage, fencing, drainage, balance	Highways England considers there is <u>that the application has provided</u> sufficient information provided to allow	Under Discussion

	<p>[REP2-101]</p>	<p><u>elements of the Scheme</u></p> <p><u>Areas of the Scheme where further refinement or illustration of effect is required to avoid and/or minimise harm to OUV and significance:</u></p>	<p><u>secondary infrastructure and landscaping</u></p> <p><u>Paragraphs 1.13 (a) (b) (c) (d) and (e)</u></p>	<p>ponds, landscaping including tree planting in and adjacent to the WHS; <u>HBMCE state that detail is required in relation to key engineering elements of the Scheme, including the relocated Longbarrow Junction, the tunnel approaches in retained cuttings and tunnel portals. This additional information should address engineering design, levels in relation to existing topography, the approach and selection of materials and surface treatments, landscape integration, and visibility of associated infrastructure such as lighting and signage.</u></p> <p><u>Detail is needed in relation to Green Bridge 4, including design detail, landscaping proposals, the ensured confirmation of its width at 150m and of its positioning.</u></p> <p><u>Detail is needed in relation to the tunnel canopies, including design detail, confirmation of their positioning, and landscape proposals to understand how they will be integrated into the landscape.</u></p> <p><u>A greater degree of precision is needed in relation to the actual positioning of the tunnel portals given the sensitivity of the landscape. Historic England considers the limits of lateral deviation westwards in the first draft DCO of 200m for the</u></p>	<p><u>Historic England to understand, engage with and respond to and comment on the Scheme and that a number of the points of discussion will be addressed as part of the detailed design of the Scheme.</u></p> <p><u>Further details of junctions, the tunnel approaches and portals (including engineering design, levels in the application, relation to existing topography, approach to materials selection and surface treatments and landscape integration) will be developed through the detailed design process. This will enable the best opportunity to draw on the skill and experience of the contractor to be brought fully into the detailed design and implementation phase and therefore greatest potential for innovation and latest practice and technology to be fully considered at the stage immediately before implementation.</u></p> <p><u>The current OEMP [REP6-011] includes a design vision together with a set of design principles for key elements of the Scheme. Highways England will consult key stakeholders, including HBMCE, on the external appearance of the following elements of the Scheme within the World Heritage Site:</u></p>	
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	<p>[REP6-053]</p>	<p>ExA question DCO.2.51 – Requirement 4, OEMP</p>	<p>Page 10</p>	<p><u>western portal to be unjustified at this point.</u></p> <p><u>Detail is needed in relation to the management of light levels (both from infrastructure and vehicle headlights), because of effects of light on the night time historic environment, in particular, in relation to the tunnels and retained cuttings within the SAAS WHS.</u></p> <p><u>In our Written Representations [REP2-100] (paragraph 7.6.24) HBMCE indicated that whilst it is possible that some aspects of lighting for the Scheme might be comfortably addressed at Detailed Design Stage, sufficient indication of the parameters for decision making must be subject to Examination. We advised that this might be addressed through production of a lighting strategy for the Scheme. In relation to the tunnel portals specifically (7.6.50) we advised that clarification regarding how light levels will be managed at these points in the landscape to avoid any harm to Attribute 4 of the OUV of the WHS. Subsequently HBMCE have continued through heritage design meetings in relation to the OEMP to discuss the provision for lighting design at the tunnel portals and elsewhere where there is potential for the WHS to be affected.</u></p> <p><u>As noted above, the OEMP remains the focus of discussion on the detail of the</u></p>	<p><u>a) The tunnel service buildings (Work No.1D(ii));</u> <u>b) Portals structures (Work Nos. 1E(ii) and 1G(iii)), retaining walls (part of Work Nos. 1D(ii) and 1H(ii)) and Green Bridge Four (Work No.1d(i)); and</u> <u>c) Public rights of way, including pedestrian, cycling and non-motorised user provision and wayfinding including surfacing, materials, fencing and gating.</u></p> <p><u>Outside of the World Heritage Site Highways England will consult key stakeholders, including HBMCE, on the external appearance of the following:</u></p> <p><u>a) Signing and lighting at the new Longbarrow junction (Work No.1C(ii)); and</u> <u>b) Signing and lighting at the Countess junction (Work No.1H(iv)).</u></p> <p><u>Longbarrow Junction</u></p> <p><u>The layout of the proposed Longbarrow junction is shown on sheet 5 of the Works Plans [APP-008], described in Schedule 1 and shown indicatively on Sheet 5 of the General Arrangement Drawings [APP-012]. The junction has been located as close as possible to the point of</u></p>	
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	<p><u>Current position</u></p>			<p><u>Scheme. We would expect the detailing of key engineering elements to be covered as part of this discussion.</u></p>	<p><u>intersection of the A303 and A360 alignments while at the same time minimising impact on the WHS and other environmental receptors.</u></p> <p><u>Tunnel Approaches and Portals</u></p> <p><u>Visualisations of the tunnel approaches and portals can be found in section 6.4 of the Design and Access Statement [APP-295]. Further detail is shown illustratively on sheets 7, 8, 10 and 11 of the Structures Drawings [APP-017]. Additional visualisations were submitted at Deadline 6, which are currently being reviewed by HBMCE. Further visualisations, in response to ongoing dialogue, are being submitted at Deadline 7.</u></p> <p><u>Levels in relation to existing Topography</u></p> <p><u>Proposed road levels in relation to existing ground levels are shown in the Engineering Drawings (Plans and Profile) [APP-010]. These drawings show the difference between existing and proposed levels at 100m intervals. Further information can be seen in the Engineering Drawings (Cross Sections) [APP-011] which show both existing and proposed levels at selected cross sections along the Scheme. Vertical levels of</u></p>	
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					<p><u>deviation (Article 7 of the draft development consent order [REP6-005]) are more limited in an upwards direction in the WHS than in a typical road scheme, recognising the sensitivity of the site. The Outline Environmental Management Plan (OEMP) [REP6-011] also contains design commitments relating to levels and surrounding topography.</u></p> <p><u>Approach to Materials selection and surface treatment</u></p> <p><u>Further details, including width and surface treatment of new rights of way, fence lines and structural finishes, are under discussion with heritage stakeholders and Wiltshire Council. As noted above, the OEMP [REP6-011] includes a design vision, further design commitments on these matters, design principles and a mechanism for consultation with heritage stakeholders, including HBMCE, on the detailed design of aspects of the Scheme. Table 4.1 of section 4 of the OEMP details a wide range of principles to direct the appearance of the detailed design of the Scheme within and beyond the WHS, considering such matters as: landscaping, structures, surfacing, lighting and public rights of way.</u></p>	
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					<p><u>A description of the earthwork landscape proposals is included in paragraph 2.3.55 of Chapter 2 of the ES [APP-040] For further detail refer to ES chapter 7 2 Landscape and Visual Effects [APP-045]. The final landscaping for the Scheme is controlled by requirement 8, which requires a landscaping scheme to be approved by the Secretary of State for each part of these design elements the Scheme before it is set out below: commenced.</u></p> <p><u>Lighting</u></p> <p><u>The majority of the scheme will Scheme would not be lit. There would will be no external road lighting within the WHS beyond that necessary within outside the tunnel and beneath the c. 150 metre wide or Green Bridge No. 4 (operating and this lighting will be designed to avoid light spill. There will be no lighting to retaining cutting walls or the external walls of tunnel control buildings during the routine operation of the Scheme. The existing lighting provision at Countess roundabout will be replaced with a modern system that will reduce light spill. The lighting under Green Bridge No. 4 will only operate during the day time only). There would and will be no lighting within the open-cutting, and tunnel lighting would be designed dimmer controlled at dusk.</u></p>	
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					<p>and down to minimise avoid sudden bursts of light spill outsideemitting into the landscape at these specific times of the tunnel portals day. There wouldwill be no roadside lighting at the new Longbarrow Junction, and the improved Countess junction would utilise new directional roadside lighting to minimise light spill. These are significant improvements over the current situation, where both Countess and Longbarrow junctions are brightly lit. lighting on any PRoW within the Scheme. This lighting is provided for in the Outline Environmental Management Plan (OEMP) [APP-187] (D-CH9 to D-CH12), [REP6-011], and paragraph 4 of Schedule 2 of the DCO [APP-020]draft development consent order [REP6-005] requires the Scheme to be carried out in accordance with the OEMP.</p> <p>In the context of the WHS, the Scheme has committed to no signage or other vertical installations (such as CCTV) above the top of the cutting and no lighting of signs at the western end of the Scheme in order to protect the WHS's OUV (see OEMP, D-CH8). Appropriate signage and infrastructure would be provided outside the WHS to manage traffic through the corridor.</p>	
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					<p>Drainage proposals, including the proposed location and size of balancing ponds, are outlined in the Road Drainage Strategy [APP-281]. Paragraph 10 of Schedule 2 <u>Green Bridge No 4</u></p> <p><u>Highways England has committed, via the OEMP [REP6-011] to the width of Green Bridge No. 4 being 145 – 149.9 metres. It also contains the design vision, additional design commitments, design principles to help guide the development of the detailed design together with a robust stakeholder consultation mechanism to involve heritage stakeholders, including HBMCE, in the development of aspects of the detailed design. Compliance with the OEMP is secured via requirement paragraph 4 of Schedule 2 of the draft development consent order [REP6-005].</u></p> <p><u>Tunnel Canopies</u></p> <p><u>Highways England has prepared an update to the draft DCO [APP-020] requires Highways England to submit written details OEMP [REP6-011] which contains additional design commitments (including in relation to tunnel canopy), design principles to help guide the development of the</u></p>	
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					<p>drainage system based on mitigation measures included detailed design together with a robust stakeholder consultation mechanism to involve heritage stakeholders, including HBMCE, in the Environmental Statement.</p> <p>Fencing in the WHS shall be developed in consultation with the National Trust, HBMCE, English Heritage and Wiltshire Council, as secured in the Outline Environmental Management Plan (OEMP) [APP-187] (D-CH14). The main works contractor shall consult with HMAG to determine the type of development of construction boundary fencing to be used aspects of the detailed design within the WHS or within the setting of WHS. The type of fencing would be sympathetic to the setting of the WHS. The World Heritage Site. Compliance with the OEMP is secured under via paragraph 4 of Schedule 2 within of the draft DCO [APP-020]. development consent order [REP6-005].</p> <p>As reflected in, ES Chapter 7, Landscape and Visual [APP-045], paragraph 7.8.5, the landscape mitigation design principles in the context of the WHS included the implementation of a planting strategy to respect the objectives of the WHS Management Plan, which include to minimise new planting in or adjacent to the WHS. As such, the Scheme will focus principally on establishment of</p>	
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					<p>chalk grassland rather than tree planting, as set out in ES Chapter 7, Landscape and Visual [APP-045], Section 8, Table 8.5. Under requirement 8 of Schedule 2 of the DCO, Highways England will be required to submit a detailed landscaping scheme, which is required to be on the basis of the mitigation measures set out in the ES, which includes the above principles.</p> <p>The design of these elements will be developed further through the detailed design process in consultation with HBMCE.</p>	
4.8	<p>[RR-1897]1897REP 2-101</p> <p>[REP2-100]</p>	<p>Page 2</p> <p>Management of the Scheme (OEMP)</p>	<p>Detail of proposals for temporary works and reinstatement post construction Strategy for the Environmental Management of Temporary and Permanent elements of the Scheme</p>	<p>HBMCE states that there is an absence of detailed proposals for construction - period temporary infrastructure and reinstatement of affected land post-construction.</p> <p>HBMCE stated in the Written Representation [REP2-100] that there a need for a robust strategy for the environmental management of both temporary and permanent elements of the Scheme.</p> <p>Within the Written Representations [REP2-100] HBMCE stated that the relevant management plans for the Scheme should establish a procedure for managing and securing under the DCO the avoidance of collateral damage to and preservation in situ of standing and below ground remains in</p>	<p>Highways England considers sufficient detail has been provided to enable HBMCE to understand and comment on the proposals. Details of the construction compounds are provided in Chapter 2 [APP-040], with the proposed locations shown on the General Arrangement Drawings [APP-012], with layouts shown indicatively in ES Figure 2.7 [APP-061]. The potential impacts of the compounds and the activities associated with them would be controlled by measures to limit or avoid dust, noise, spillage and disruption by construction traffic, as set out in the Outline Environmental Management Plan (OEMP), ES Appendix 2.2 [APP-187], which is secured by paragraph 4 of Schedule 2 of the draft Development Consent Order [APP-020]. On</p>	Under Discussion

		<p><u>Executive Summary and Conclusion</u></p>	<p><u>7.6.128</u></p> <p><u>Paragraph 8.8(l)</u></p>	<p><u>accordance with HBMCE’s Preserving Archaeological Remains guidance (HBMCE 2016). This must include all temporary works, whether protective measures around standing remains or the construction of temporary access routes, and must clarify the measures that will be implemented to ensure the full range of impacts, including compression of below ground remains, will be avoided.</u></p> <p><u>Sufficient information is required to set out a clear baseline for development of a robust strategy for environmental management of both the temporary and permanent elements of the Scheme. This must ensure the safeguarding of the sensitivity of specific areas in relation to OUV and heritage significance and respect the policies of the WHS Management Plan throughout. It must also, in HBMCE’s opinion, include for appropriate consultation and where necessary approval of statutory bodies responsible for the historic environment.</u></p> <p><u>There are a range of issues associated with the environmental management of temporary and permanent works under the Scheme. These might be picked up through the OEMP, dDCO, DAMS, OLEMP. A review of these documents together with Highways England’s document hierarchy/matrix and continuing discussions will assist in our</u></p>	<p><u>completion, the construction compounds, and all other temporary facilities, would be removed and the land reinstated, secured through the OEMP (MW-G30). Where land is occupied temporarily for the purposes of construction, before giving up possession of the land, Highways England must restore it to the reasonable satisfaction of the owner in accordance with article 29 of the draft DCO [APP-020]. The strategy for the environmental management of the scheme is provided within the Outline Environmental Management Plan (OEMP) [REP6-011]. The OEMP requires the contractor(s) to develop Construction Environmental Management Plans (CEMPs) for the Scheme’s preliminary works and main works, which must be prepared in accordance with the principles of the OEMP. This includes the development of various subplans outlined in items PW-CH1 (Preliminary Works Heritage Management Plan) and PW-NOI3 (Preliminary Works Noise and Vibration Management Plans) and listed within MW-G7:</u></p> <ol style="list-style-type: none"> <u>1. Site Waste Management Plan;</u> <u>2. Emergency Preparedness and Response Plan;</u> <u>3. Heritage Management Plan;</u> <u>4. Ground Movement Monitoring Strategy</u> 	
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				<p><u>consideration of whether or not these issues have been resolved.</u></p>	<p>5. <u>Landscape and Ecology Management Plan;</u> 6. <u>Arboricultural Mitigation Strategy;</u> 7. <u>Noise and Vibration Management Plan;</u> 8. <u>Noise Insulation and Temporary Rehousing Policy;</u> 9. <u>Soils Management Strategy;</u> 10. <u>Water Management Plan;</u> 11. <u>Groundwater Management Plan;</u> 12. <u>Materials Management Plan;</u> and 13. <u>Traffic Management Plan.</u></p> <p><u>The OEMP confirms that HBMCE is to be consulted in the development of the CEMPs and the Handover Environmental Management Plan (HEMP). HBMCE will therefore be consulted upon the various sub-plans identified above. The OEMP is secured by Requirement 4 of Schedule 2 of the draft development consent order [REP6-005], therefore the consultation provided for in the OEMP, as outlined above, will ensure that the views of HBMCE are taken in to account in finalising the documentation, prior to Highways England's approval.</u></p> <p><u>The OEMP also confirms that Site Specific Written Schemes of Investigation will be produced in consultation with the members of</u></p>
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					<p><u>HMAG (for works within the WHS) and WCAS (for works outside of the WHS) and Historic England (for works outside of the WHS which would otherwise require scheduled monument consent) and approval by Wiltshire Council (in consultation with Historic England, to the extent the works the subject of the approval would ordinarily trigger the need for scheduled monument consent) prior to the relevant works commencing.</u></p> <p><u>A matrix/ hierarchy setting out the various documents to be created, when they will be available, who will be consulted on their content and the process for consultation has been shared with the members of HMAG. A workshop is to be convened in the immediate future to allow a detailed discussion to take place. A date for this workshop is being sought ahead of hearings scheduled for mid/ late August.</u></p> <p>The design of these elements will be developed further through the detailed design process in consultation with HBMCE.</p>	
4.9	[RR-1897]	<u>Areas of the Scheme where further refinement or illustration of effect is required to</u>	Tunnel Limits of Deviation	Tunnel limits of deviation: the location of the proposed western portal has been carefully considered – yet there is a proposed limit of deviation of up to 200m westwards, which is a significant variation in relation to the local topography.	The <u>Tunnel Limits of Deviation (LoDs) set out the maximum parameters LOD) are necessary to deliver the scheme facilitate the safe construction of the TBM bored tunnel by allowing some realignment of the location of the temporary drive and reception portals at the western and</u>	Under Discussion

	<p><u>REP2-1011</u></p> <p><u>Current Position</u></p>	<p><u>avoid and/or minimise harm to OUV and significance</u></p> <p>Page <u>35</u></p> <p>Page <u>7</u></p>	<p><u>Paragraph 1.13(d)</u></p> <p><u>Paragraph 1.13(k)</u></p>	<p><u>HBMCE stated in the Summary of Written Representations [REP2-101] a greater degree of precision is needed in relation to the actual positioning of the tunnel portals given the sensitivity of the landscape. HBMCE considers the limits of lateral deviation westwards in the first draft DCO of 200m for the western portal to be unjustified at this point.</u></p> <p><u>HMBCE stated in the Summary of Written Representations [REP2-101] that detail is needed (e.g. in relation to vertical limits of deviation for the tunnel), together with consideration of a parameters framework, to ensure that there is no restriction to potential future archaeological work above or below ground level but above the tunnel crown level identified in the first draft DCO. This would be contrary to Article 4 of the 1972 Convention and the policies of the SAAS WHS Management Plan.</u></p> <p><u>The lack of design details relating to some elements of the Scheme does not provide clarity over the impacts the deviations could have. We remain in discussion so that Highways England</u></p>	<p><u>eastern end of the tunnel should this be necessary by the contractor.</u></p> <p><u>The proposed means of tunnelling is based on the assembly and launch of the tunnel boring machine ("TBM") from the point of commencement of the tunnel, with the first tunnel drive west to east towards Amesbury. At the end of the first drive, the TBM will be received within the temporary portal where it will be turned around and re-launched to drive the second bore east to west. Therefore, the location of the drive and reception portals is a very important consideration as part of overall safe tunnel construction and operation of the TBM and flexibility is sought to facilitate this in tunnelling.</u></p> <p><u>TBMs are large and complex machines; the cutting head and segment erector are contained within the shield and constitute the main components at the front of the TBM and are followed by a long train of supporting ancillary trailers supplying all the mechanical and electrical equipment, pre- cast segments and other materials in addition to the means of removing the excavated material. Making an adjustment to either the vertical or horizontal alignment of the tunnel can only be accommodated by a series of small incremental adjustments during the</u></p>	
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				<p><u>can provide clarification of these impacts through visualisations or written details.</u></p>	<p><u>construction of each individual ring within the front shield. Therefore, any change in the alignment for a large diameter TBM can take between 200-300m to accommodate during tunnelling. This is why the 200m westerly deviation is sought at the western portal.</u></p> <p><u>The document 8.31 - Comments on the DAMS and on any further information available at this stage in the process. The requested by the ExA and received to Deadline 3 – explains limits of deviation in further detail at page 13-122.</u></p> <p><u>The extent to which the 200m westwards LoD is used will be determined during detailed design and their full exercise has been assessed in the Environmental Statement and HIA report on the effects of the scheme, including the LoDs. Highways England continues to liaise with the HBMCE regarding the scheme design and the points raised.</u></p>	
4.10	[RR-1897]	<u>Restriction of Future Archaeological Work in WHS.</u>		<p>Potential restriction of future archaeological research within the affected part of the WHS (e.g. above the tunnel route). This would be contrary to the provisions of the Stonehenge WHS Management Plan, reflecting obligations accepted by the UK Government in ratifying the World Heritage Convention. Restrictions on future archaeological</p>	<p><u>As noted in the Statement of Reasons [APP-023], restrictions are required. The proposed Scheme would provide powers to require third parties to contact Highways England for approval prior to carrying out future archaeological research above the tunnel route, in order to secure protection of the tunnel from-</u></p>	Under Discussion

	<p>[REP2-101]</p>	<p><u>Areas of the Scheme where further refinement or illustration of effect is required to avoid and/or minimise harm to OUV and significance:</u></p>	<p><u>Paragraph 1.13 (k)</u></p>	<p>research could have an adverse impact upon the OUV of the WHS.</p> <p><u>HBMCE stated in the Summary of Written Representations [REP2-101] that detail is needed (in relation to vertical limits of deviation for the tunnel), together with consideration of a parameters framework, to ensure that there is no restriction to potential future archaeological work above or below ground level but above the tunnel crown level identified in the draft DCO. This would be contrary to Article 4 of the 1972 Convention and the policies of the SAAS WHS Management Plan.</u></p> <p><u>Sufficient information is required on aspects of the Scheme (e.g. tunnel plan and deviation limits) where there could be potential for its operation and maintenance to restrict future archaeological work above the tunnel crown level. This is to ensure that these details are assessed during the Examination to establish a practicable long term solution to ensure that there will be no restriction on future archaeological research in the SAAS WHS as a result of the Scheme. Any such restriction would be contrary to Article 4 of the 1972 Convention and the policies of the SAAS WHS Management Plan and would therefore be considered unacceptable.</u></p>	<p>potentially conflicting future development and works that might jeopardise<u>protect</u> the structural integrity of the tunnel. Highways England<u>There are no restrictions intended elsewhere and restrictions over the tunnel will continue to be applied where the integrity of the tunnel was at risk.</u></p> <p><u>Restrictions will vary along the length of the tunnel, depending upon the depth of the tunnel below the surface. The detail of the restriction is confirmed in Highways England's response to ExA question CH.1.27 [REP2-025] which states that it would restrict excavations below 0.6m in areas where the tunnel is shallow, and below 1.2m in areas where the tunnel is deeper. The restriction would not prevent excavations from being undertaken below this depth but would require a promoter of future archaeological research to consult with HBMCE regarding this matter.</u><u>Highways England in such cases in order to determine the extent to which that activity might have the potential to affect the structural integrity of the tunnel.</u></p> <p><u>Where archaeological research is identified requiring activity restricted by the above proposed terms (such as by requiring excavations deeper than 0.6m or 1.2m, depending on the</u></p>	
	<p>[REP2-100]</p>	<p><u>Section 8.8</u></p>	<p><u>Bullet (m)</u></p>	<p><u>Sufficient information is required on aspects of the Scheme (e.g. tunnel plan and deviation limits) where there could be potential for its operation and maintenance to restrict future archaeological work above the tunnel crown level. This is to ensure that these details are assessed during the Examination to establish a practicable long term solution to ensure that there will be no restriction on future archaeological research in the SAAS WHS as a result of the Scheme. Any such restriction would be contrary to Article 4 of the 1972 Convention and the policies of the SAAS WHS Management Plan and would therefore be considered unacceptable.</u></p>	<p><u>Restrictions will vary along the length of the tunnel, depending upon the depth of the tunnel below the surface. The detail of the restriction is confirmed in Highways England's response to ExA question CH.1.27 [REP2-025] which states that it would restrict excavations below 0.6m in areas where the tunnel is shallow, and below 1.2m in areas where the tunnel is deeper. The restriction would not prevent excavations from being undertaken below this depth but would require a promoter of future archaeological research to consult with HBMCE regarding this matter.</u><u>Highways England in such cases in order to determine the extent to which that activity might have the potential to affect the structural integrity of the tunnel.</u></p> <p><u>Where archaeological research is identified requiring activity restricted by the above proposed terms (such as by requiring excavations deeper than 0.6m or 1.2m, depending on the</u></p>	

	[REP6-053]	Page 3	DCO2.26 Restriction of Future Archaeological Work in WHS	<p>In HBMCE's Responses to the ExA's Written Questions, we stated that discussions continue with Highways England to address the concerns raised and identify an acceptable solution to enable archaeological work to continue without affecting the stability of the tunnel. We would hope to update the Examining Authority in due course</p> <p>Discussions are continuing regarding a proposed "covenant" which would provide a framework for archaeological research to take place but these have not yet been resolved.</p>	location), the restrictive covenants would require consultation with Highways England in order to analyse on a case by case basis and determine to what extent the proposed archaeological works may be permitted.	
4.11	[RR-1897] [REP2-101] [REP4-084]	Page 3 Provisions of the DCO	Provisions of the DCO Paragraph 1.16 Paragraph 192	<p>Appropriateness of some of the provisions of the draft DCO (in light of the scheme traversing the WHS) to secure the protection of the historic environment and to ensure that there are mechanisms to implement and deliver the mitigation, benefits and legacy provisions and aspirations of the scheme.</p> <p>The HBMCE Summary of Written Representations [REP2-101] stated that</p> <p>As detailed in the HBMCE Comments on the d2 Development Consent Order submitted at Deadline 3 [REP4-084], there are a number of issues that have been raised regarding the d2DCO as currently drafted. These range from the</p>	<p>Highways England continues to consider the application is sufficiently detailed to allow HBMCE to understand and comment on the Scheme.</p> <p>Section 4 of the OEMP [REP6-011] has been developed in consultation with HBMCE and welcomes any specific points to set out how Highways England will involve key stakeholders, including HBMCE, in the detailed design of certain key aspects of the Scheme and, in Table 4.1, identifies key Design Principles that HBMCE wishes to raise in relation to the provisions will inform the detailed design of the Scheme. Requirement 4 of Schedule 2 of the</p>	Under Discussion

				<p><u>detailed commentary on interpretation and the works provisions through to the general approaches being taken, possible unintended consequences for the historic environment, and an overarching commentary on the extent of our engagement in the sign off of documents.'</u></p> <p><u>A number of issues have been raised in relation to the dDCO and discussions continue with Highways England in relation to whether these can be resolved.</u></p>	<p>draft DCO- <u>[REP6-005] secures the OEMP.</u></p> <p><u>Comments on the Deadline 3 d2DCO from Historic England were received at Deadline 4. These comments have been taken into consideration as part of the revised draft DCO submitted at Deadline 6 [REP6-005 along with detailed responses to Historic England's comments on the dDCO [REP4-084].</u></p>	
4.12	[RR-1897]	<p><u>Role of HBMCE in consultation and approval and discharge of requirements</u></p> <p>Page 3</p>	<p><u>Paragraph 1.17</u></p> <p>Role of HBMCE in consultation and approval and discharge of requirements</p>	<p>Adequacy of measures for consultation and engagement of HBMCE in the Discharge of Requirements – in light of the impact on the WHS and archaeology.</p> <p><u>HBMCE has highlighted the need to ensure that the procedures for consultation and engagement with Historic England in the discharge of requirements are adequate in light of the status of the WHS, the need to secure the protection of scheduled monuments in the landscape during construction, and the need to ensure appropriate mitigation of impacts on archaeological remains.</u></p>	<p><u>Updated Deadline 6 documents – DAMS [REP6-013], OEMP [REP6-011] and dDCO [REP6-005] provide for more clarity on the Role of HBMCE in consultation and approval.</u></p> <p>Consultation with HBMCE on matters pertaining to its functions is secured in two key ways.</p> <p>1. Requirement 4 of Schedule 2 to the draft DCO [APP-020REP6-005] requires Highways England to carry out the Scheme in accordance with the Outline Environmental Management Plan [APP-187 (“OEMP”)], <u>updated at deadline 6 [REP6-011].</u> The OEMP requires the contractor to develop Construction Environmental Management Plans (“CEMP”) for the Scheme, which</p>	Under Discussion

				<p><u>Consequently, we have requested clarification from Highways England about the scope and hierarchy of documents that would be produced as part of the delivery of the Scheme. This would ensure that we can have clarity over the safeguards that are proposed and ensure that where we would be engaged/consulted we would provide added value and our engagement post-consent would be considered necessary and proportionate. We have requested this information to help inform our response with regards to how best to fulfil our role as a statutory consultee, as adviser to the State Party, and as a member of the HMAG forum through the process of consultation and engagement post-consent including in relation to revision to documents. This clarification has yet to be provided in full.</u></p> <p><u>Due to the international importance of the WHS, there is a greater need for us to have certainty over the safeguards so that we can have the assurance over what is provided.</u></p> <p><u>We consider Highways England need to provide the document hierarchy/matrix which we can review and provide our views on engagement and consultation in advance of 6th September deadline set by the ExA</u></p>	<p>must be prepared in accordance with the principles of the OEMP.</p> <p>The OEMP requires the preliminary works CEMP to include for the preliminary works:</p> <ul style="list-style-type: none"> • PW-CH1 – a Heritage Management Plan, prepared in consultation with <u>the members of HMAG</u> (of which, HBMCE is a member) and Wiltshire Council Archaeological Service; • PW-CH3 – Site Specific Written Schemes of Investigation, produced in consultation with HMAG,<u>the members of HMAG, HBMCE and Wiltshire Council Archaeological Service</u> to describe the mitigation measures that will be carried; • PW-CH4 – Method Statements, produced in consultation with HMAG<u>the members of HMAG, HBMCE and Wiltshire Council Archaeological Service</u> for works within the WHS, to include protective fencing for identified heritage assets and appropriate archaeological mitigation measures; • PW-CH5 – Site Specific Written Schemes of Investigation, produced in consultation with HMAG,<u>the members of HMAG, HBMCE and Wiltshire Council Archaeological Service</u> to include measures to install temporary barrier fencing to limit land disturbance at the 	
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					<p>western portal and eastern portal approaches;</p> <ul style="list-style-type: none"> • PW-CH6 – Site Specific Written Schemes of Investigation, developed in consultation with <u>HMAG the members of HMAG, HBMCE and Wiltshire Council Archaeological Service</u> for works within the WHS, to include measures to avoid significant archaeological remains where possible and implement appropriate archaeological mitigation measures where impacts are unavoidable; • PW-LAN1 – requires consultation with <u>HMAG the members of HMAG, HBMCE and Wiltshire Council Archaeological Service</u> prior to the installation of fencing to protect retained vegetation within the WHS; In respect of the main works the OEMP requires the main works CEMP to include: <ul style="list-style-type: none"> • MW-CH1 – Heritage Management Plan based on the Detailed Archaeological Mitigation Strategy (see requirement 5 of Schedule 2 to the draft DCO (APP-020)), prepared in consultation with <u>the members of HMAG, HBMCE</u> and Wiltshire Council Archaeological Service, indicating how the historic environment is to be protected in a consistent and integrated manner. • MW-CH3 requires consultation with <u>HMAG the members</u> 	
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					<p><u>of HMAG, HBMCE and Wiltshire Council Archaeological Service</u> on the type of construction boundary fencing to be used within the WHS or its setting and to be included in an Archaeological Method Statement forming part of a main works CEMP;</p> <ul style="list-style-type: none"> • MW-CH5 requires the development in consultation with <u>HMAGthe members of HMAG, HBMCE and Wiltshire Council Archaeological Service</u> for works within the WHS, of Archaeological Method Statements describing the appropriate measures to be used where potentially sensitive archaeological remains are required to be buried or sealed beneath fill material; • MW-CH6 requires the preparation, in consultation with <u>HMAGthe members of HMAG, HBMCE and Wiltshire Council Archaeological Service</u> for works within the WHS, of Site Specific Written Schemes of Investigation in respect of service/utility corridors requiring excavations, to avoid archaeological remains wherever possible and implement appropriate archaeological mitigation measures where impacts are unavoidable; • MW-CH7 requires appropriate monitoring arrangements for all heritage assets during the construction programme, prepared in 	
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					<p>consultation with <u>HMAGthe members of HMAG, HBMCE and Wiltshire Council Archaeological Service</u> for works within the WHS.</p> <p><u>2. Secondly</u>, Requirement 5 under Schedule 2 to the draft DCO [APP-020] requires the Scheme to be carried out in accordance with the Detailed Archaeological Mitigation Strategy, which is being developed in consultation with HBMCE. Highways England has submitted a document that further clarifies relationship between the Detailed Archaeological Mitigation Strategy and the OEMP [AS-010].</p> <p><u>As explained above, the OEMP submitted at Deadline 3 and the updated version of the OEMP submitted at Deadline 6 [REP6-011] contains new obligations to consult HBMCE on key aspects of the scheme both within the WHS and outside of its boundary. The OEMP confirms that Site Specific Written Schemes of Investigation will be produced in consultation with the members of HMAG (for works within the WHS) and WCAS (for works outside of the WHS) and Historic England (for works outside of the WHS which would otherwise require scheduled monument consent) and approval by Wiltshire Council (in</u></p>	
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					<p><u>consultation with Historic England, to the extent the works the subject of the approval would ordinarily trigger the need for scheduled monument consent) prior to the relevant works commencing.</u></p> <p><u>A matrix/ hierarchy setting out the various documents to be created, when they will be available, who will be consulted on their content and the process for consultation has been shared with the members of HMAG. A workshop is to be convened in the immediate future to allow a detailed discussion to take place. A date for this workshop is being sought ahead of hearings scheduled for mid/ late August.</u></p>	
<u>4.13</u>	<u>[REP2-101] and meeting of 18 June 2019</u>		<u>Mapping Issues</u>	<p><u>The Summary of Written Representations submitted by HBMCE [REP2-101], clarification of mapped detail is required where works are proposed adjacent to or abutting scheduled monuments.</u></p> <p><u>Due to discrepancies between the scale at which Scheduled Monuments are mapped (1:10,000) and the scale of the Applicant's plans which identified the boundary of the works, in relation to relevant Scheduled Monuments, (1:2,500), Historic England require evidence based plans to show that the Scheme would not have any direct impact upon relevant Scheduled</u></p>	<p><u>The requirement for Scheduled Monument Consent is disapplied by the Planning Act 2008 but the principle is understood. Highways England has produced a series of drawings that superimpose the Scheme LiDAR dataset and the results of the comprehensive geophysical surveys across the Scheme, with the Scheme design and the mapped scheduled areas. The updated drawings for the draft DAMS as submitted at Deadline 6 [REP6-013], which illustrate the preservation in situ areas and their associated protection zones for Scheduled Monuments, have taken in to account</u></p>	<u>Under Discussion</u>

				<p><u>Monument boundaries, to enable Historic England to confirm that there would be no direct physical impact on the monuments.</u></p>	<p><u>both the LiDAR and geophysical survey information in their mapping and the defining of the protection zones. The drawings with the LiDAR and geophysical survey information, that have informed definition of the protection zones for Scheduled Monuments proposed for the Scheme, will be shared with Historic England.</u></p>	
<p>4.1314</p>	<p>Meeting 06/02/19 <u>[REP2-100]</u></p>	<p><u>N/A Paragraph 6.10.5</u></p>	<p><u>Listed buildings Registered parks and gardens</u></p>	<p>Further comment to follow from HBMCE in written representations.</p> <p><u>HBMCE has commented on the potential effects of the Scheme on some designated heritage assets scoped out of the assessment in the ES where our own assessment indicates that these form part of a series of related assets; where the physical approach to the asset contributes to its significance and the route of that approach falls within the Scheme; or where other assets historically associated with that asset are affected by the Scheme. The ES recognises the potential contribution to significance of such relationships (Section 3.6.1). We therefore do not necessarily agree with the scoping out of all of these assets from the Settings Assessment. For this reason, we have commented on the Grade I listed Amesbury Abbey as part of a complex of historically, spatially and functionally associated designated assets. An important part of the setting of this Grade</u></p>	<p>Await comments from HBMCE regarding the EIA and the Grade II* registered park and garden at Amesbury Abbey. Highways England acknowledges Historic England's comments, but stands by its Setting Assessment and EIA. Highways England continue to discuss the design principles in the OEMP and wording, so that appropriate principles are incorporated in to the detailed design, so that Historic England's concerns are addressed.</p>	<p>Under Discussion</p>

				<p><u>I listed building is its designed and parkland landscape (the Grade II* Registered Park and Garden of Amesbury Abbey), part of which is directly affected by the Scheme. In addition, Amesbury Abbey has a historic relationship with the site now known as Countess Farm (Grade II listed), also affected by the Scheme. As a result, we consider it more appropriate to assess the impact of the Scheme on this interconnected complex of historic assets rather than just focusing on the Grade II* registered landscape element and the Grade II listed buildings at Countess Farm.</u></p>	
<p><u>4.15</u></p>	<p><u>[REP2-101]</u></p> <p><u>[REP6-053]</u></p>	<p><u>Deposition of processed chalk arisings at Parsonage Down East</u></p> <p><u>Page 26</u></p>	<p><u>Paragraph 1.13(f)</u></p> <p><u>CH.2.9</u></p>	<p><u>Detail remains required in relation to the deposition at Parsonage Down East of the processed chalk arisings from the boring of the tunnels. This relates in particular to:-</u></p> <ul style="list-style-type: none"> <u>• the preservation of archaeological remains;</u> <u>• the impacts of temporary works compounds and haul routes; and</u> <u>• long term-impacts on the significance of designated heritage assets, where this part of the landscape forms part of their setting.</u> <p><u>HBMCE continues in discussion with Highways England regarding the integration of a consistent approach for management of excavated topsoil under the scheme between the DAMS, the</u></p>	<p><u>The Draft Detailed Archaeological Mitigation Strategy (DAMS) [REP6-013; paragraphs 4.3.7 – 4.3.12 preservation in situ and Appendix D Action Areas: Preservation in situ – Action Areas 8, 9, 10.1, 10.2, 11 and 25] sets out the archaeological mitigation strategy in relation to the preservation of archaeological remains under fill materials at Parsonage Down including temporary works compounds and haul routes.</u></p> <p><u>The DAMS [REP6-013] and the OEMP [REP6-011] both require the development of a Scheme-wide Heritage Management Plan (HMP) for the Main Works phase (detailed in the OEMP [MW-CH1]) which will indicate how the historic environment is to be protected in a consistent and</u></p>

				<p><u>OEMP and the Soil Management Strategy and within which of these documents appropriate mitigation measures are best located, ensuring that the documents support cross compliant methods of working to avoid conflict with BS3882.</u></p>	<p><u>integrated manner including in relation to the effects of construction (including placement of fill). Similarly there is a requirement for a soils management strategy (PW-GEO3 and MW-GEO3). The HMP and SMS will be developed in consultation with members of the Heritage Monitoring and Advisory Group (HMAG) including HBMCE, and will be approved by Wiltshire Council, in consultation with HBMCE where the works the subject of the HMP would otherwise require scheduled monument consent.</u></p> <p><u>The Environmental Statement (ES) Chapter 6 Cultural Heritage [APP-044, paragraph 6.9.21 and Table 6.10: Summary of significant effects – construction (temporary)] summarises the temporary construction impacts of the deposition of excavated material and the consequent re-profiling of the area east of Parsonage Down in relation to designated heritage assets. Once construction has been completed and landscaping has established, no significant effects are anticipated on designated heritage assets.</u></p>	
4.1416	Meeting-06/02/19[REP2-100]	N/A	Application of Preserving Archaeological Remains	Further comment to follow from HBMCE in written representations. HBMCE has provided advice to Highways England regarding its development of a strategy under the Scheme to ensure that archaeological remains at Blick Mead	Await comments from HBMCE regarding the EIA and the listed buildings in the vicinity of Countess roundabout. The Scheme alignment has been optimised past the Blick Mead archaeological site, to avoid	Under Discussion

	<p>[REP4-085]</p>	<p><u>Mesolithic Site at Blick Mead</u></p> <p><u>Page 21</u></p>	<p><u>Tiered Assessment at Blick Mead</u></p> <p><u>Paragraphs 7.6.77 – 7.6.93</u></p> <p><u>[Para 7.3.5] Listed buildings</u></p>	<p>would be preserved in line with published HBMCE guidance on 'Preserving of Archaeological Remains' on water environment assessment techniques (HBMCE 2016).</p> <p>This guidance is aimed at addressing two aspects of the decision-taking process:</p> <p>a) <u>Understanding the state of preservation of archaeological material, as a contribution to the assessment of a site's significance; and</u></p> <p>b) <u>Understanding the nature of potential impacts of a proposed development, to assist in the assessment of the degree of harm that might be caused to the site and its significance.</u></p> <p>The results of the most recent data collection conducted by the Applicant have provided information that supports the predictions of the model. Since we understand that the Environment Agency are content with the methodology, general model and conclusions of that modelling from their reading of the reports submitted to the Examination, we have therefore been able to confirm that the Applicant has followed our guidance in producing the tiered assessment, that sufficient information has been brought together for the reliability of the conceptual model to reach an acceptable level.</p>	<p>land-take and to keep the road at existing grade. Ground water modelling predicts no impact on Blick Mead (Abbey Pond) or the River Avon (see Blick Mead Tiered Assessment presented, ES Appendix 11.4 – Groundwater Risk Assessment, Annex 3 [APP-282]). The ES therefore reports No change and a Neutral Effect on the Blick Mead archaeological site (Appendix 6.8 – Cultural Heritage - Summary of non- significant effects [APP-217, page 5]).</p> <p>However, given the interest in the site, hydrological monitoring at Blick Mead is continuing and includes monitoring of water levels and springs at shallow depths.</p> <p>HIA para 8.2.6 notes that "The Scheme design has been developed to reduce the land-take within the WHS [...] Land-take at and around Blick Mead will be avoided, all Scheme elements (including temporary haul roads) avoiding the known extent of this asset".</p> <p>The comments provided by Historic England at ISH2 are welcomed, in that the tiered assessment undertaken by the applicant was adequate and the need to continue beyond Tier 2 was not justified.</p>	
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45 _____ Matters Not Agreed

4.4.15.1.1 There are no matters Not Agreed at the present time.

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