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**To:** [A303 Stonehenge](#)  
**Cc:** [Harries, Beth](#)  
**Subject:** A303 Stonehenge TR010025: Historic England's (HBMCE) Concluding Submission  
**Date:** 01 October 2019 18:32:09  
**Attachments:** [TR010025-HBMCE Concluding Submissions 01 October 2019.pdf](#)  
**Importance:** High

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Dear Sir/ Madam,

**Application by Highways England for an Order Granting Development Consent for the A303 Amesbury to Berwick Down**

**Reference: TR010025 - 20019871**

**Concluding Submission**

As referred to in our Written Representations, the Historic Buildings and Monuments Commission for England is generally known as Historic England. However, due to the potential for confusion in relation to "HE" (Highways England and Historic England), we have used "HBMCE" in our formal submissions to the examination to avoid confusion.

Please find attached a concluding submission on behalf of Historic England (HBMCE) in relation to the above application.

Should you have any queries regarding our submission, please do not hesitate to contact me.

We should be grateful if you would confirm receipt of our document.

We understand that the Examination closes tomorrow and we should be grateful if you would send confirmation through to me when this takes place.

Yours faithfully,

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Historic England

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Historic England

**CONCLUDING SUBMISSION**

**(01 OCTOBER 2019)**

**ON BEHALF OF THE**

**HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND**

**(HISTORIC ENGLAND)**

**("HBMCE")**

**Application by**

**Highways England for an Order granting Development Consent for the A303**

**Amesbury to Berwick Down**

**PINS Reference No: TR010025**

**HBMCE Reference No: 20019871**

## 1. CONCLUDING SUBMISSION

- 1.1. The Historic Buildings and Monuments Commission for England (HBMCE) is more commonly known as Historic England. We are the government's statutory adviser on all matters relating to the historic environment, including world heritage. It is our duty under the provisions of the National Heritage Act 1983 (as amended) to secure the preservation and enhancement of the historic environment.
- 1.2. Following publication of the final iterations of key documents forming part of the A303 Amesbury to Berwick Down DCO, this is HBMCE's concluding submission to the Examination, to be read in conjunction with our Deadline 9 submission [REP9-038]<sup>1</sup>.
- 1.3. From the outset of the Examination we have supported the aspirations of the Scheme and we believe it offers the potential to deliver beneficial outcomes for the historic environment. By putting much of the current surface road into a bored tunnel, it would allow archaeological features within the Stonehenge, Avebury and Associated Sites World Heritage Site (SAAS WHS) currently separated by the A303 trunk road to be appreciated as part of a reunited landscape and facilitate greater public access to this internationally important site.
- 1.4. Our objective through the course of the Examination has been to ensure that the historic environment is fully and properly taken into account in the determination of the application and, if consented, that appropriate safeguards have been built into the Scheme across the dDCO (Development Consent Order), Outline Environmental Management Plan (OEMP) and Detailed Archaeological Mitigation Strategy (DAMS).
- 1.5. As such, we have worked with Highways England to ensure the DCO appropriately recognises the unparalleled landscape of the SAAS WHS that the Scheme, submitted in illustrative form, will traverse. Through these discussions and our submissions to the Examination, we identified a number of concerns where further information, detail, clarity or

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<sup>1</sup> The table in Appendix 1 sets out an update on where and how these issues have been addressed in the various Highways England Deadline 9 submissions.

amendments were needed, particularly around how the impacts of the Scheme would be mitigated.

- 1.6. We have now completed our review of the final iterations of key documents forming part of the DCO and we are pleased that these concerns have broadly been addressed. This has followed extensive discussions on the dDCO and its interaction and relationship with the DAMS and OEMP.
- 1.7. We believe that the dDCO, OEMP and DAMS set out a process to ensure that heritage advice and considerations can play an appropriate and important role in the construction, operation and maintenance of the Scheme. As a consequence of the incorporation of the Design Vision, Commitments and Principles in the OEMP, together with arrangements for consultation and engagement with HBMCE, we consider sufficient safeguards have been built in for the detailed design stage.
- 1.8. We also welcome Highways England's positive engagement with our advice and recommendations on successive iterations of the DAMS. The DAMS is underpinned by a series of Scheme specific research questions which will ensure that an understanding of the OUV of the WHS and the significance of the historic environment overall will guide decision making and maximise opportunities to further understand this exceptional landscape. The DAMS ensures that the archaeological mitigation under the SSWSIs will be supported by the use of innovative methods and technologies and the implementation of an iterative and intelligent strategy, which will enable it to make a unique contribution to international research agendas.
- 1.9. We consider that, other than the continued inclusion of "convenient" within Article 7 of the dDCO and the reference to CEMPs only being prepared "substantially" in accordance with the OEMP, there are now sufficient provisions for the protection of the historic environment in the dDCO covering the detailed design of the Scheme.
- 1.10. Given the amendments and assurances we have requested and received during the course of the Examination and the safeguards that are now built into the DCO overall, we can be more confident of the Scheme's potential to deliver benefits for the historic environment. The Scheme proposes a significant reduction in the sight and sound of traffic in the part of the SAAS

WHS where it will most improve the experience of the iconic Stonehenge monument itself, and enhancements to the experience of the solstitial alignments. It will also facilitate wider access, allowing people to reach and explore this landscape further, reuniting previously severed parts of the SAAS WHS. These are all significant benefits for the historic environment.

- 1.11. If consented, HBMCE will continue to advise Highways England on the detail of the design and delivery of the Scheme. This will help to ensure that impacts on OUV are minimised and that the potential benefits for the historic environment are delivered in practice.

## Appendix 1

|   | Topic   | HBMCE Deadline 9 Submission Reference | Issue   | Addressed by Highways England? | How addressed                | Where addressed       |
|---|---|---------------------------------------|---|--------------------------------|------------------------------|-----------------------|
| 1 | <b>Compulsory Purchase</b>  | 2.4.1 - 2.4.5                         | The proposed compulsory acquisition of land will have a bearing on HBMCE land ownership. English Heritage Trust has led on this on our behalf.  | Not Addressed                  | n/a                          | n/a                   |
| 2 | dDCO – <b>Article 7 - Limits of Deviation</b><br><br>“convenient”                             | 3.1.6                                 | HBMCE and ExA consider it is not appropriate for the undertaker to exercise limits of deviation on the basis of it being “convenient” to do so. | Not Addressed                  | n/a                          | n/a                   |
| 3 | dDCO – <b>Article 7 – Vertical Limits of Deviation (Archaeological research above tunnel)</b> | 3.1.7 – 3.1.8                         | Potential restriction of archaeological research above tunnel area in the WHS – confirmation of Limits of Deviation.                            | Addressed                      | Addressed in Deadline 9 dDCO | REP9-003:Article 7(5) |

|   | <b>Topic</b>  | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>  | <b>Addressed<br/>by Highways<br/>England?</b> | <b>How addressed</b>   | <b>Where addressed</b>  |
|---|---|--|---|---|--|---|
| 4 | <b>dDCO –Article 14 (Protective works to buildings) and 15 (Authority to survey and investigate land)</b>     | 3.1.10 – 3.1.13  | Definition of “building” encompasses scheduled monuments; Several scheduled monuments on land “adjacent” to but outside Order Limits. | Addressed                                     | Addressed in Deadline 9 dDCO<br><br>Addressed in Deadline 9 Explanatory Memorandum<br><br>Addressed in Deadline 9 DAMS | REP9-003: Article 3(1) (h)<br><br>REP9-007: 6.17; 7.40 – 7.48<br><br>REP9-017: 5.1.3                            |
| 5 | <b>dDCO - Protective Provisions</b>   | 3.1.14 – 3.1.15 and Appendix 1                           | Need for Protective Provisions to embed the international importance of the SAAS WHS within the dDCO.                                 | Addressed                                     | Addressed in Deadline 9 dDCO   | REP9-003: page 4 Recitals; Article 2; Paragraph 1, Part 1 of Schedule 2; Requirement 13(1) Part 1 of Schedule 2 |
| 6 | <b>dDCO - Article 2 – Interpretation “preliminary works” (also Requirement 1 (1) of Part 1 to Schedule 2)</b> | 3.1.18   | Gaps and inconsistencies in scope of preliminary works within the OEMP.   | Addressed                                     | Addressed in Deadline 9 OEMP<br><br>Addressed in Deadline 9 DAMS   | REP9-013: 1.2.10-13; Table 3.2a<br><br>REP9-017: 5.1.5; 7.2   |



|   | <b>Topic</b>  | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>  | <b>Addressed<br/>by Highways<br/>England?</b> | <b>How addressed</b>   | <b>Where addressed</b>  |
|---|---|--|---|---|--|---|
| 7 | dDCO<br><br><b>Article 2 –<br/>Interpretation –<br/>“maintain”;<br/>“ancillary<br/>works” in<br/>Schedule 1;<br/>references to<br/>“Illustrative” in<br/>plans and<br/>drawings; and<br/>“authorised<br/>works”</b> | 3.1.20   | Clarification of implications the Scheme could have for SAAS WHS and within its setting through submission of additional visualisations and revisions to the OEMP and DAMS. | Addressed                                     | Addressed in Deadline 9 OEMP<br><br>Addressed in Deadline 9 DAMS<br><br>Addressed in submissions of further visualisations | REP9-013: Table 3.2a, Table 3.2b; Table 4.1<br><br>REP9-017<br><br>REP8-022-026; REP7-025; REP7-026-038 |
| 8 | dDCO<br><br><b>Article 4(1) -<br/>Extent of Order<br/>limits</b>  | 3.1.22 – 3.1.23  | Inclusion of appropriate safeguards for scheduled monuments and SAAS WHS.   | Addressed                                     | Addressed in Deadline 9 dDCO<br><br>Addressed in Explanatory Memorandum<br><br>Addressed in Deadline 9 DAMS                | REP9-003: Article 3(1) (h)<br><br>REP9-007: 6.17 and 7.40 - 7.48<br><br>REP9-017: 5.1.3                 |

|    | <b>Topic</b>   | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>  | <b>Addressed<br/>by Highways<br/>England?</b> | <b>How addressed</b>                                 | <b>Where addressed</b>    |
|----|--|--|---|---|--|---------------------------|
| 9  | dDCO<br><br><b>Article 4(2) -<br/>“adjacent”</b>   | 3.1.24   | Clarification of<br>“adjacent” and that<br>enactments to be<br>covered are “local”.   | Addressed                                     | Addressed in Deadline<br>9 Explanatory<br>Memorandum | REP9-007: 7.2             |
| 10 | dDCO<br><br><b>Article 7 -<br/>Limits of<br/>deviation –<br/>Consultation<br/>with other<br/>persons</b> | 3.1.26 – 3.1.30  | Consistency of wording<br>with inclusion of “and<br>the statutory roles and<br>responsibilities of such<br>person” in this Article so<br>that it replicates<br>provision in<br>Requirement 3(1), Part<br>1, Schedule 2. | Addressed                                     | Addressed in Deadline<br>9 dDCO                      | REP9-003: Article<br>7(6) |

|    | <b>Topic</b>   | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>  | <b>Addressed<br/>by<br/>Highways<br/>England?</b> | <b>How addressed</b>  | <b>Where addressed</b>                                      |
|----|--|--|---|---|---|---|
| 11 | dDCO<br><br><b>Articles 12 –<br/>Access to works;<br/>Article 13 –<br/>Discharge of<br/>Water; Article 17 –<br/>felling or lopping<br/>of trees and<br/>hedgerows;<br/>Article 31 –<br/>Statutory<br/>undertakers; and<br/>Requirement 7,<br/>Part 1 of Schedule<br/>2 – contaminated<br/>land and<br/>groundwater</b> | 3.1.31   | Potential for unintended<br>consequences on<br>archaeological remains.  | Addressed   | Addressed in Deadline<br>9 DAMS<br><br>Addressed in Deadline<br>9 OEMP                            | REP9-017: 5.1.3<br><br>REP9-013:<br>PW-CH1                  |
| 12 | dDCO<br><br><b>Article 16 –<br/>Removal of<br/>Human Remains</b>   | 3.1.32 –<br>3.1.33                                       | Essential to ensure that<br>human remains are<br>treated with respect,<br>employing high<br>standards and best<br>practice. | Addressed   | Addressed in Deadline<br>9 dDCO<br><br>Addressed in Deadline<br>9 DAMS (see also row<br>26 below) | REP9-003: Article<br>16(13)<br><br>REP9-017: 6.3.75<br>- 88 |

|    | <b>Topic</b>   | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>  | <b>Addressed<br/>by<br/>Highways<br/>England?</b> | <b>How addressed</b>   | <b>Where addressed</b>                     |
|----|--|--|---|---|--|--|
| 13 | dDCO<br><br><b>Article 29 –<br/>Powers of<br/>Acquisition and<br/>possession of<br/>land</b>                         | 3.1.34   | Need for works to be covered by programme of archaeological mitigation.           | Addressed   | Addressed in Deadline 9 DAMS   | REP9-017: 5.1.3                            |
| 14 | dDCO<br><br><b>Article 58 –<br/>Arbitration</b>  | 3.1.36   | Need for appropriate process for dispute resolution.                              | Addressed   | Addressed in Deadline 9 OEMP<br><br>Addressed in Deadline 9 DAMS   | REP9-013: 4.5.13 - 15<br><br>REP9-017: 8.7 |
| 15 | dDCO<br><br><b>Requirement 1(1),<br/>Part 1, Schedule 2<br/>erection of<br/>construction plant<br/>and equipment</b> | 3.1.37 –<br>3.1.38                                       | Need for appropriate control of the erection of construction plant and equipment. | Addressed   | Addressed in Deadline 9 OEMP (HBMCE also understands from Highways England that further clarification has been made to the OEMP o address this point at PW-G1) | REP9-013:<br>PW-CH1;<br>MW-CH1; P-G06      |

|    | <b>Topic</b>   | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>  | <b>Addressed<br/>by Highways<br/>England?</b> | <b>How addressed</b>   | <b>Where addressed</b>   |
|----|--|--|---|---|--|--|
| 16 | dDCO<br><br><b>Requirement 3(1)<br/>– Preparation of<br/>Detailed Design</b>                                     | 3.1.39 – 3.1.43  | Wording of provisions<br>/drafting refinements<br>and gaps in coverage of<br>design commitments<br>and principles/<br>consultation. | Addressed                                     | Addressed in Deadline<br>9 OEMP<br><br>Addressed in Deadline<br>9 DAMS | REP9-013: 1.1.10;<br>1.2.9; 1.4; Table<br>3.2a; Table 3.2b<br><br>REP9-017: 8.5; 8.6 |
| 17 | dDCO<br><br><b>Requirement 4 –<br/>Outline<br/>Environmental<br/>Management Plan<br/>- Lighting<br/>strategy</b> | 3.1.44 – 3.1.46  | Drafting refinements<br>and gaps in design<br>commitments and<br>principles – lighting<br>strategy.                                 | Addressed                                     | Addressed in Deadline<br>9 DAMS<br><br>Addressed in Deadline<br>9 OEMP | REP9-013:<br>D-CH20;<br><br>REP9-017:<br>D-CH26;<br>P-PRoW3                          |

|    | <b>Topic</b>   | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>   | <b>Addressed<br/>by Highways<br/>England?</b> | <b>How addressed</b>         | <b>Where addressed</b>      |
|----|--|--|--|---|------------------------------|-----------------------------|
| 18 | dDCO<br><br><b>Requirement 4 –<br/>Outline<br/>Environmental<br/>Management Plan<br/>- “substantially”</b> | 3.1.47 – 3.1.48  | HBMCE considers that reference to “ <i>substantially</i> ” with regard to “preliminary works CEMP must be prepared <i>substantially</i> in accordance” should be deleted from Requirement 4(6), (11) and (12) and Sections 1.1.6; 1.3.1 b); 3.1.2; 3.2.9; 3.2.11; MW-G7 of OEMP. | Not Addressed                                 | n/a                          | n/a                         |
| 19 | dDCO<br><br><b>Requirement 11 –<br/>Details of<br/>Consultation -<br/>Consultation<br/>Responses</b>       | 3.1.51   | Copies of consultation responses to be enclosed, for the benefit of the Secretary of State, with the summary report on the consultation.   | Addressed                                     | Addressed in Deadline 9 dDCO | REP9-003:<br>Requirement 11 |

|    | <b>Topic</b>   | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>   | <b>Addressed<br/>by Highways<br/>England?</b> | <b>How addressed</b>         | <b>Where addressed</b>        |
|----|--|--|--|---|------------------------------|-------------------------------|
| 20 | <b>DAMS –<br/>Baseline<br/>Information -<br/>Assessment of<br/>Previous<br/>Research</b> | 3.2.2 – 3.2.3  | Need for Section 3 of the DAMS to provide an updated overview of previous work as baseline for development of mitigation strategy.             | Addressed                                     | Addressed in Deadline 9 DAMS | REP9-017: Section 3.1-3       |
| 21 | <b>DAMS –<br/>Archaeological<br/>Research Agenda<br/>(ARA)</b>                           | 3.2.4 – 3.2.10   | Need for Section 4 of the DAMS (ARA) to set out Scheme specific research questions.  | Addressed                                     | Addressed in Deadline 9 DAMS | REP9-017:<br>Section 4.1-11   |
| 22 | <b>DAMS –<br/>Outline Written<br/>Scheme of<br/>Investigation<br/>(OWSI)</b>             | 3.2.11 – 3.2.14  | Need for Sections 5/6 of the DAMS (Strategy & OWSI) to address recording of assets in a manner proportionate to the importance and the impact. | Addressed                                     | Addressed in Deadline 9 DAMS | REP9-017: 5.1-5.4;<br>6.1-6.9 |

|    | <b>Topic</b>                               | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>   | <b>Addressed<br/>by Highways<br/>England?</b> | <b>How addressed</b>  | <b>Where addressed</b>                                |
|----|--|--|--|---|---|---|
| 23 | <b>DAMS -<br/>Sampling</b>                 | 3.2.15-18  | Need for robust approach to sampling informed by ARA and contributing to iterative and intelligent strategy. | Addressed                                     | Addressed in Deadline 9 DAMS  | REP9-017: 5.3.29-31; 6.1.24; 6.3                      |
| 24 | <b>DAMS -<br/>Ploughzone</b>               | 3.2.19-23  | Need for inclusion of appropriate strategy to address significance of ploughzone material.                   | Addressed                                     | Addressed in Deadline 9 DAMS  | REP9-017: 6.3.11-20                                   |
| 25 | <b>DAMS –<br/>Statistical<br/>Analysis</b> | 3.2.24-27  | Inclusion of Statistical Analysis in range of techniques and methodologies employed.                         | Addressed                                     | Addressed in Deadline 9 DAMS  | REP9-017: 6.1.14; 6.3.15-18                           |
| 26 | <b>DAMS – Human<br/>Remains</b>            | 3.2.28 – 29  | Essential to ensure that human remains are treated with respect, employing high standards and best practice. | Addressed                                     | Addressed in Deadline 9 DAMS<br><br>Addressed in Deadline 9 dDCO (see row 12 above) | REP9-017: 6.3.75 – 88<br><br>REP9-003: Article 16(13) |



|    | <b>Topic</b>  | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>  | <b>Addressed<br/>by Highways<br/>England?</b>   | <b>How addressed</b>   | <b>Where addressed</b>  |
|----|---|--|---|---|--|---|
| 27 | <b>DAMS –<br/>Protection of<br/>Scheduled<br/>Monuments</b>           | 3.2.30 – 38  | Need for provisions to ensure works around Scheduled Monuments within and along the boundary of the Order Limits do not have direct physical impact on nationally important archaeological remains. | Addressed   | Addressed in Deadline 9 DAMS<br><br>Addressed in Deadline 9 dDCO<br><br>Addressed in Deadline 9 Explanatory Memorandum                 | REP9-017: 5.2.5<br><br>REP9-003: Article 3(1) (h)<br><br>REP9-007: 6.17;<br>7.40 – 7.48 |
| 28 | <b>DAMS –<br/>Archaeological<br/>Mitigation at<br/>Tunnel Portals</b> | 3.3.2  | Provision that prior to approval of the SSWSI for the areas surrounding the tunnel portals, the location of the portals should be confirmed.  | Addressed (HBMCE understands from Highways England that changes have been made to an updated DAMS/OEMP to address this point) | Addressed in DAMS (to be submitted before close of Examination)<br><br>Addressed in OEMP (to be submitted before close of Examination) | Section 5.2.4<br><br>PW-CH5   |

|    | <b>Topic</b>   | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>   | <b>Addressed<br/>by Highways<br/>England?</b> | <b>How addressed</b>         | <b>Where addressed</b>                               |
|----|--|--|--|---|------------------------------|--|
| 29 | <b>OEMP -<br/>Consultation with<br/>HBMCE</b>                    | 3.4  | Appropriate consultation and engagement with HBMCE in statutory role.  | Broadly Addressed                             | Addressed in Deadline 9 OEMP | REP9-013: 1.1.10; 1.2.9; 1.4; Table 3.2a; Table 3.2b |
| 30 | <b>DESIGN –<br/>Vision,<br/>Commitments &amp;<br/>Principles</b> | 3.5.1 - 3  | Inclusion of appropriate design vision, commitments and principles, embedded mitigation.   | Addressed                                     | Addressed in Deadline 9 OEMP | REP9-013: 4.2; 4.3; Table 4.1                        |
| 31 | <b>DESIGN<br/>Consultation and<br/>Engagement with<br/>HBMCE</b> | 3.5.4 - 6  | Inclusion of appropriate safeguards given that Scheme is illustrative, for heritage input including with HBMCE as statutory consultee. | Addressed                                     | Addressed in Deadline 9 OEMP | REP9-013: 4.5; Table 3.2a; Table 3.2b; Table 4.1     |
| 32 | <b>DESIGN<br/>Quality of Design</b>                              | 3.5.7 - 9  | Need to refine design principles to recognise the presence of the SAAS WHS through the quality of design.                              | Addressed                                     | Addressed in Deadline 9 OEMP | REP9-013: P-PWS04                                    |

|    | <b>Topic</b>                        | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>   | <b>Addressed<br/>by Highways<br/>England?</b> | <b>How addressed</b>   | <b>Where addressed</b>   |
|----|-------------------------------------|--|--|---|--|--|
| 33 | <b>DESIGN -<br/>Temporary Works</b> | 3.5.15 - 16  | Need for inclusion of appropriate safeguards specifically related to design of Temporary Works.  | Addressed                                     | Addressed in Deadline 9 OEMP   | REP9-013: PW-CH1; MW-CH1; P-G06  |
| 34 | <b>DESIGN –<br/>PRoWs</b>           | 3.5.17 - 20  | Need for inclusion of appropriate safeguards for design of PRoWs to ensure historic environment is taken account of in decision making regarding surface treatment and materials.      | Addressed                                     | Addressed in Deadline 9 OEMP   | REP9-013: D-CH26; P-PRoW1-4  |
| 35 | <b>DESIGN -<br/>Landscaping</b>     | 3.5.21 - 25  | Inclusion of appropriate safeguards for design of landscaping scheme taking account of landscape character to ensure decision making holistic across natural and historic environment. | Addressed                                     | Addressed in Deadline 9 dDCO<br><br>Addressed in Deadline 9 OEMP<br><br>Addressed in Deadline 9 DAMS | REP9-003: Requirement 8<br><br>REP9-013: PW-LAN2; MW-LAN2; 4.2; P-G01; P-LEO1-6<br><br>REP9-017: 5.2.20 - 22 |

|    | <b>Topic</b>  | <b>HBMCE<br/>Deadline 9<br/>Submission<br/>Reference</b> | <b>Issue</b>   | <b>Addressed<br/>by Highways<br/>England?</b> | <b>How addressed</b>                                | <b>Where addressed</b>        |
|----|---|--|--|---|---|-------------------------------|
| 36 | <b>POST-CONSENT<br/>MANAGEMENT –<br/>Archaeological<br/>Research within<br/>WHS</b> | 4.1  | Need to ensure that there is clarity regarding how the restrictive covenants will operate in practice to ensure archaeological work in the SAAS WHS is not restricted. | Broadly Addressed                             | Addressed in Deadline 9 DAMS (see also row 3 above) | REP9-017: 5.2.11 - 12         |
| 37 | <b>POST-CONSENT<br/>MANAGEMENT<br/>(Byways)</b>                                     | 4.2  | Access & Traffic Management (Byways). Need for inclusion for appropriate safeguards for design of crossing points of byways.   | Broadly Addressed                             | Addressed in Deadline 9 OEMP                        | REP9-013: D-CH4; 4.2; P-PRoW4 |