

A303 Amesbury to Berwick Down

TR010025

8.3 (2) Statement of Common Ground – Historic Buildings and
Monuments Commission for England

Deadline 10~~Deadline 7~~

PFP Regulation 5(2)(q)

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

October~~August~~ 2019



Infrastructure Planning

Planning Act 2008

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

A303 Amesbury to Berwick Down
Development Consent Order ~~2019~~20^[**]

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

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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.....



Derek Parody**[NAME]**

Project Manager
on behalf of Highways England

Date: 2 October 2019**[DATE]**

Signed.....



[NAME]Dr Helen Woodhouse
Team Leader – Development Advice
[POSITION]

on behalf of Historic Buildings and
Monuments Commission for England

Date: **[DATE]** 2 October 2019

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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) 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 final current position at the end of the examination + Deadline 7 on relevant issues of fact in respect of the Scheme described in the seven fourth draft revision of the Development Consent Order (October July 2019) and the design and mitigation measures set out in the versions of the DAMS and the OEMP submitted at Deadline 9 together with correspondence between Highways England and HBMCE submitted subsequently to clarify points that were under discussion. set out in the Deadline 9 version of the DAMS and the OEMP. Unless a matter is stated as agreed, it cannot be taken be ~~as~~ agreed. ~~This edition of the SoCG for Deadline 7 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 England”. 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.

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 meetings of the following groups, that 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 2-1 – 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.
15 May 2019	Meeting	Meeting at Historic England Offices, Queen Square, Bristol to discuss the Statement of Common Ground.
28 May 2019	Meeting	Meeting at AECOM's Offices, Portwall Place, Bristol to discuss updating the draft Statement of Common Ground.
18 June 2019	Meeting	Meeting at AECOM's Offices, Portwall Place, Bristol to discuss updating the draft Statement of Common Ground.
25 July 2019	Telecon	Telecon to discuss the Statement of Common Ground.
30 July 2019	Telecon	Telecon to discuss key issues and proposals for their resolution.
1 August 2019	Meeting	Meeting at Highways England's Bristol office to discuss the draft DCO.
17 September 2019	Meeting	Meeting at Highways England's Bristol office to discuss; the DAMS, OEMP and SOCG.
1 October 2019	Telephone conversations and e mail exchange	Finalisation of SOCG

- 2.1.4 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

Issue Ref	Doc Ref	Paragraph Reference	Sub-section	HBMCE Comment	Highways England Response	Status
3.1	[RR-1897]	Page 1	Relevant Representation	<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>HBMCE support the aspirations of the road scheme proposed in the DCO and believe that it offers the potential to deliver a beneficial</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.</p> <p>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. This continues through the channels set out in section 2 above.</p> <p>The need for a number of matters to be addressed is understood by Highways England and is reflected in this SOCG, which demonstrates the significant progress that has been made and</p>	Agreed

				<p>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 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.</p>	<p>the steps that are being taken to reach agreement on the resolution of those matters outstanding.</p> <p>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.</p>	
3.2	[REP02-100]	Paragraph 1.16 and 1.17	Deadline 2	<p>HBMCE supports the concept (i.e. the aspirations) of a road scheme and considers that the Scheme (as presently articulated in the DCO) has potential to actually deliver a beneficial outcome for the historic environment helping to sustain and enhance the Outstanding Universal Value (OUV) of the WHS.</p> <p>However, if this potential is to be realised in practice it is essential that a number of matters are satisfactorily addressed, such as by 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</p>	<p>Highways England acknowledges the support of Historic England for the aspirations of the road scheme proposed in the draft development consent order [REP82-0043]. Highways England acknowledges Historic England's statement that the Scheme offers the potential to deliver a beneficial outcome for the historic environment. The wording of protective provisions in the DCO has been agreed, as have, save for some specific points, the wording of Requirements and the other measures in the DCO.</p>	Agreed

				<p>elements of the currently illustrative scheme that has been assessed by the Environmental Impact Assessment and HIA can be appropriately ensured to be executed in line with those assessments, and, thereby, ensure delivery of the stated aspirations and objectives.</p>		
<p>4.163 .3</p>	<p>[REP2-100]</p>	<p>Mesolithic Site at Blick Mead</p> <p>Page 21</p>	<p>Application of Preserving Archaeological Remains Tiered Assessment at Blick Mead</p> <p>Paragraphs 7.6.77 – 7.6.93</p>	<p>HBMCE has provided advice to Highways England regarding its development of a strategy under the Scheme to ensure that archaeological remains at Blick Mead 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) Understanding the state of preservation of archaeological material, as a contribution to the assessment of a site's significance; and b) Understanding the nature of</p>	<p>Ground water modelling has been undertaken for the Schemeand this predicts no impact on the Blick Mead (Abbey Pond) or the River Avon. This is presented in a Tiered Assessment [ES Appendix 11.4 – Groundwater Risk Assessment, Annex 3 [APP-282]] which has been prepared in accordance with Historic England's 2016 guidance 'Preserving Archaeological Remains. Decision-Taking for Sites Under Development, Appendix 3 Water Environment Assessment Techniques, Section 2, Tiered Assessment'.</p> <p>Highways England welcomes Historic England's confirmation that the assessment has been conducted in line with the</p>	<p>Agreed Under Discussion</p>

	[REP4-085]		[Para 7.3.5]	<p>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.</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>	Preserving Archaeological Remains guidance. appropriate.	
3.4	RR-1897	Page 2	Detailed Archaeological Mitigation Strategy (DAMS) & Overarching	HBMCE request the detailed archaeological mitigation strategy (DAMS). Historic England request an Overarching Written Scheme of Investigation to accompany the DAMS.	The draft Detailed Archaeological Mitigation Strategy (DAMS) has been developed in consultation with HBMCE, Wiltshire Council Archaeology Service and other members of the Heritage Monitoring and Advisory Group,	It is agreed between HBMCE and Highways England that the

	<p>[REP2-100]</p>	<p>Page 129</p>	<p>Written Scheme of Investigation</p> <p>Paragraph 8.8(k)</p>	<p>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 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,</p>	<p>with inputs from the Scientific Committee, which sets out the structured, iterative detailed archaeological mitigation strategy. The final DAMS submitted at deadline 9 is rooted in a heritage research-led framework.</p> <p>-</p> <p>The draft DAMS was submitted to the Examination for the second deadline (DL2) [REP2-038]. Comments made by HBMCE at deadline 3 were included in the draft DAMS submitted at Deadline 4 [REP4-024]. The draft DAMS was further revised and submitted at Deadline 6 [REP6-013], deadline 7 (addressing comments received at deadlines 5 and 6) and deadline 8 [REP8-008], and a final DAMS submitted at deadline 9 addressing the subsequent comments of HBMCE as well as other stakeholders.</p> <p>The DAMS will be secured by Requirement 5 under Schedule 2 of the draft Development Consent Order (DCO) submitted at deadline 9.</p>	<p>issues that HBMCE has raised in relation to the DAMS have been addressed.</p>
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	<p>[REP3-054]</p>	<p>Page 7</p>	<p>Paragraph 1.16</p>	<p>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.'</p> <p>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.</p> <p>Although detailed work remains required, we are optimistic that with continuing discussions with</p>	<p>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, also submitted at deadline 9.</p>	
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				<p>Highways England it may develop its current document in an appropriate manner for the Scheme.'</p> <p>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.</p>	
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	Position Statement at deadline 9			<p>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 provide any further comments on in advance of 6th September deadline set by the ExA for receipt of a final version.</p> <p>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this document, but we will need to review a final version of that document before this can be confirmed.</p>		
3.5	[REP2-100]	‘Management of the Scheme’	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>	The REAC table 3.2a of the Outline Environmental Management Plan (OEMP) has been submitted as part of the DCO application, and provides sufficient information for the decision-making process at this stage and to allow ongoing consultation and comment on the Scheme with members of HMAG.	It is Agreed between HBMCE and Highways England that the issues that HBMCE has raised in relation

	<p>[REP4-086]</p>	<p>Comments on OEMP submitted at Deadline 3</p>	<p>Whole document</p>	<p>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.</p> <p>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</p>	<p>An update of the OEMP has since been submitted at Deadline 9 [REP9-013] confirming changes made to the OEMP in response to comments received throughout the examination</p> <p>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 it has been demonstrated that the Scheme has the necessary funding to allow the Scheme to be delivered once approved. Highways England has also provided information to HBCME regarding the timing of the preliminary works in relation to the award of the main works contract and appointment of the main works contractor. As a consequence, there is no risk of archaeology being undertaken and the Scheme not being taken forward subsequently.</p>	<p>to the OEMP have been broadly addressed</p>
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	<p>[REP4-085]</p>	<p>HBMCE Written summaries of oral submissions put at Issue Specific Hearings held between 4 and 14 June 2019</p>	<p>Sections 9-13, 15-19, 21-23.</p>	<p>further actively engage with the core objective of cultural heritage, archaeological mitigation and the issue of consultation and sign off.</p> <p>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.</p>	<p>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 and updated in light of comments received. A workshop was held to allow a detailed discussion to take place.</p> <p>The final OEMP and final DAMS have been submitted at deadline 9. The OEMP will be secured under Requirement 4 of Schedule 2 of the DCO, also issued at deadline 9. The DAMS will be secured under Requirement 5 of the DCO.</p>	
	<p>[REP5-013]</p>	<p>An updated version of the DCO</p>	<p>Second paragraph</p>	<p>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 resulted in further clarification and revisions to the DAMS and similarly additional consultation on the Design</p>		

				<p><u>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>	
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				<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. 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. 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</u></p>		
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	<p><u>Position Statement at deadline 9</u></p> <p>-</p>			<p><u>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 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> <p><u>Position statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to</u></p>		
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				<p><u>this topic/document, but we will need to review a final version of that document before this can be confirmed.</u></p> <p><u>There remain minor elements of inconsistency with regards to cross referencing between the OEMP and dDCO consultation and the lack of agreed terms of reference in relation to the SDCG and our role and engagement in this.</u></p>		
3.6	[REP2-100]	Paragraph 1.12(a), 7.5.1-3	Evaluation Reports	<p><u>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. 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</u></p>	<p><u>A full and comprehensive programme of archaeological evaluation surveys has been completed. 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]). The completed archaeological evaluation reports have been developed in consultation with HBMCE and Wiltshire Council Archaeology Service together with other members of the Heritage</u></p>	<p><u>It is Agreed between HBMCE and Highways England that the issues HBMCE has raised have been addressed in section 3.3.61 of the Deadline 9 DAMS</u></p>

	<p><u>Position Statement at deadline 9</u></p>			<p><u>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 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><u>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this topic, but we will need to review a final version of the DAMS before this can be confirmed.</u></p>	<p><u>Monitoring and Advisory Group. 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 Chapter 6 and Appendix 6.8). No additional significant effects have been identified.</u></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] included a review of the</u></p>	
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					<p><u>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 was issued at deadline 7 [REP7-019]. Within the final DAMS, issued at deadline 9, paragraphs 3.3.61 and 3.3.63 have been updated to ensure the results from REP3-023 (charcoal, snails and radiocarbon dates) are reflected in lieu of issuing updated evaluation reports.</u></p>	
<p><u>3.7</u></p>	<p><u>[RR-1897][RR-1897]</u></p> <p><u>[REP4-085]</u></p>	<p><u>Page 2</u></p> <p><u>Section 9.3, page 28</u></p>	<p><u>Detail of key elements of Infrastructure and provision of visualisations</u></p> <p><u>Paragraph</u></p>	<p><u>HBMCE stated in the Relevant Representations [RR-1897] 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, construction, form and appearance of Green Bridge 4.</u></p> <p><u>The Written summaries of oral</u></p>	<p><u>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 representations will be developed through the detailed design process.</u></p>	<p><u>It is Agreed between HBMCE and Highways England that the issues that HBMCE has raised have been broadly addressed</u></p>

			<p>9.2.1</p>	<p>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.</p> <p>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.</p>	<p>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 HBMCE. The OEMP (the final version of which was submitted at deadline 9) [REP9-013] 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 including specific design principles relating to the portal and its associated infrastructure.</p> <p>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].</p> <p>With reference to Interim Advice Note 135/10 which forms the</p>	
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	<p>Position Statement at deadline 9</p>			<p>Position Statement at Deadline 9: HBMCE can confirm that the additional visualisations submitted in response to our and the Examining Authority's requests have provided a much more robust baseline for understanding the visual impacts and to consider what further opportunities might be achieved through mitigation measures linked to design.</p> <p>The Scheme is in illustrative form which enables flexibility as to its end design which will not be determined until after a decision on the DCO application is made.</p>	<p>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 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.</p> <p>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.</p> <p>Highways England has discussed with HBMCE the provision of additional visualisations and agreed a set of information which was submitted at deadline 7 [REP7-26 to 38].</p>	
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	<p>[REP4a-008]</p>	<p>Historic England's Position on Highways England proposals</p>	<p>Paragraph 14</p>	<p>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.'</p> <p>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.'</p> <p>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 redundant by the</p>	<p>No turning heads are proposed to byways 11 and 12 where they meet with the old A303. Highways England consulted on the introduction of a turning head on Old Stonehenge Road as a non-material change to the DCO (reference NMC-04) and the Examining Authority, in a procedural decision issued on 27 September 2019, has now accepted NMC-04 as part of the application . The turning head would be located to the immediate south east of the point at which Stonehenge Road is turned into a new restricted byway. The Proposed Changes Consultation Report [REP8-015] confirms the arrangement of the turning head, which will be shown in revised General Arrangement Drawings issued prior to the close of the Examination. The DAMS will be updated prior to the end of the Examination to account for this.</p> <p>Section 4 of the OEMP (final version submitted at deadline 9) has been developed in</p>	
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	<p>Position Statement at deadline 9</p>			<p>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.</p> <p>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this topic, but we will need to review a final version of the OEMP before this can be confirmed.</p> <p>The Scheme is in illustrative form which enables flexibility as to its end design which will not be determined until after a decision on the DCO application is made.</p>	<p>consultation with HBMCE to set out the design vision for the Scheme and 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 multiple commitments in respect of public rights of way.</p> <p>Design Principles describe the common general overall goal or objective but are not intended to prescribe the precise means of achieving it.. 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. Specific design commitments, including in relation to PRowS and NMU routes, are contained in Table 3.2b of the OEMP.</p>	
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					<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 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</u></p>	
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					<p><u>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></p>	
3.9	<p><u>[RR-1897]</u></p> <p><u>[REP2-101]</u></p>	<p><u>Detail of key engineering 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</u></p>	<p><u>Paragraphs 1.13 (a) (b) (c) (d) and (e)</u></p>	<p><u>HBMCE states that there is an absence of detailed proposals for lighting, signage, fencing, drainage, balance ponds, landscaping including tree planting in and adjacent to the WHS;</u></p> <p><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</u></p>	<p><u>Highways England considers that the application has provided sufficient information to allow 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 relation to existing topography, approach to materials selection and surface treatments and landscape integration) will be</u></p>	<p><u>It is agreed between Highways England and HBMCE that the issues HBMCE has raised have been broadly addressed.</u></p> <p>-</p>

		<p><u>significance:</u></p>		<p><u>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 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</u></p>	<p><u>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 OEMP, the final version of which was issued at deadline 9, [REP9-013] includes a design vision together with a set of design principles for key elements of the Scheme. Highways England, and its Contractor once appointed, will consult the SDCG on the external appearance of the following elements of the Scheme within and visible from the World Heritage Site:</u></p> <p><u>a) The tunnel service buildings (Work No.1D(ii));</u></p> <p><u>b) Portals structures (Work Nos. 1E(ii) and 1G(iii)) including lighting, retaining walls (part of</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>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>Work Nos. 1D(ii) and 1H(ii) and 1H(iii) and Green Bridge Four (Work No.1d(i)); and</u></p> <p><u>c) Public rights of way (new and interactions with existing), including pedestrian, equestrian and cycling and non-motorised user provision and wayfinding including surfacing, materials, benches, fencing and gating; and</u></p> <p><u>d) All other gating, signage and fencing.</u></p> <p><u>Outside of the World Heritage Site Highways England, and its Contractor once appointed, will consult the SDCG on the external appearance of the following:</u></p> <p><u>a) Signing and signalling at the new Longbarrow junction (Work No.1C(ii)); and</u></p> <p><u>b) Flyover, 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</u></p>	
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	<p><u>Position Statement at deadline 9</u></p>			<p><u>As noted above, the OEMP remains the focus of discussion on the detail of the Scheme. We would expect the detailing of key engineering elements to be covered as part of this discussion.</u></p> <p><u>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this topic, but we will need to review a final version of the OEMP before this can be confirmed.</u></p> <p><u>The Scheme is in illustrative form which enables flexibility as to its end design which will not be determined until after a decision on the DCO application is made.</u></p>	<p><u>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 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 7 [REP7-030, 032 and 033].</u></p> <p><u>Levels in relation to existing</u></p>	
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					<p><u>Topography</u></p> <p>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 deviation (Article 7 of the draft development consent order (submitted at deadline 9 [REP9-003]) are more limited in an upwards direction in the WHS than in a typical road scheme, recognising the sensitivity of the site. The final Outline Environmental Management Plan (OEMP) submitted at deadline 9 also contains design commitments relating to levels and surrounding topography.</p> <p><u>Approach to Materials selection</u></p>	
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					<p><u>and surface treatment</u></p> <p><u>As noted above, the final OEMP [REP9-013] 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> <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</u></p>	
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					<p><u>State for each part of the Scheme before it is commenced, and which also provides for consultation with Historic England.</u></p> <p><u>Lighting</u></p> <p><u>The majority of the Scheme would not be lit. There will be no external road lighting within the WHS outside the tunnel or Green Bridge 4 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 between dawn and dusk, be able to be varied, and will be designed to minimise light spill outside of the bridge footprint.. There will be no lighting on any PRow within the Scheme. These lighting commitments are provided for in</u></p>	
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					<p>the final OEMP issued at deadline 9 [REP9-013], and paragraph 4 of Schedule 2 of the draft development consent order (again issued at deadline 9) requires the Scheme to be carried out in accordance with the OEMP.</p> <p>Green Bridge No 4</p> <p>Highways England has committed, via the OEMP [REP9-013] to the width of Green Bridge No. 4 being 148 – 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.</p>	
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					<p><u>Tunnel Canopies</u></p> <p><u>Highways England updated the OEMP [REP6-011] to contain additional design commitments (including in relation to tunnel canopy (see item D-CH17)), 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 within the World Heritage Site. Compliance with the OEMP is secured via paragraph 4 of Schedule 2 of the draft development consent order, submitted at deadline 9.</u></p>	
<u>3.10</u>	<u>[RR-1897REP2-101]</u>	<u>Page 2</u>	<p><u>Strategy for the Environmental Management of Temporary and Permanent elements of the Scheme</u></p> <p><u>7.6.128</u></p>	<p><u>HBMCE states that there is an absence of detailed proposals for construction period temporary infrastructure and reinstatement of affected land post-construction. 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</u></p>	<p><u>The strategy for the environmental management of the scheme is provided within the Outline Environmental Management Plan (OEMP), the final version of which was submitted at deadline 9 [REP9-013]. The OEMP requires the contractor(s) to develop Construction Environmental Management Plans (CEMPs) for</u></p>	<p><u>Other than the issue of reference to 'substantiall y in accordance with' the OEMP it is agreed</u></p>

	<p>[REP2-100]</p>	<p>Management of the Scheme (OEMP)</p> <p>Executive Summary and Conclusion</p>	<p>Paragraph 8.8(l)</p>	<p>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 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.</p> <p>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</p>	<p>the Scheme’s preliminary works and main works, which must be prepared in accordance with the principles of the OEMP in order that it is substantially in accordance with the OEMP. This includes the development of various subplans outlined in items including PW-CH1, 3 and 7 (Preliminary Works Heritage Management Plan, SSWSIs and archaeological method statements), PW-NOI3 (Preliminary Works Noise and Vibration Management Plans) and PWGEO-03 (Soils Management Strategy) and for the main works listed within MW-G7:</p> <ol style="list-style-type: none"> 1. Site Waste Management Plan; 2. Emergency Preparedness and Response Plan (to include a Pollution Incident Control Plan); 3. Heritage Management Plan, SSWSIs and archaeological method statements; 4. Ground Movement Monitoring Strategy 5. Landscape and Ecology 	<p>between Highways England and HBMCE that our issues have been broadly addressed.</p>
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	<p><u>Position Statement at deadline 9</u></p>			<p><u>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 consideration of whether or not these issues have been resolved.</u></p> <p><u>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this topic, but we will need to review</u></p>	<p><u>Management Plan;</u></p> <ol style="list-style-type: none"> <u>6. Arboricultural Mitigation Strategy;</u> <u>7. Noise and Vibration Management Plan;</u> <u>8. Noise Insulation and Temporary Relhousing Policy;</u> <u>9. Soils Management Strategy;</u> <u>10. Water Management Plan, (to include a Flood Risk Management Plan ;</u> <u>11. Groundwater Management Plan;</u> <u>12. Materials Management Plan; and</u> <u>13. Traffic Management Plan (to include a Construction Workforce Travel Plan, a Site Access Plan, construction traffic routing details and a Site Travel Plan).</u> <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</u></p>	
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				<p>a final version of the OEMP before this can be confirmed.</p>	<p>consulted upon the various sub-plans identified above. The OEMP is secured by Requirement 4 of Schedule 2 of the draft development consent order, submitted at deadline 9 [REP9-003], 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.</p> <p>The OEMP also now includes Design Principle PG-06 which requires all temporary works to be designed and undertaken to minimise their visual impact.</p> <p>The OEMP also confirms that Site Specific Written Schemes of Investigation will be produced in consultation with Wiltshire Council and Historic England, and for sites within or affecting the WHS, HMAG) and approved by Wiltshire Council (in consultation with Historic England) prior to the relevant works commencing.</p>	
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					<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 and a workshop was held to allow a detailed discussion to take place.</u></p>	
<p><u>3.11</u></p>	<p><u>[RR-1897]</u></p> <p><u>REP2-101]</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>Page 5</u></p>	<p><u>Paragraph 1.13(d)</u></p>	<p><u>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.</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</u></p>	<p><u>The Tunnel Limits of Deviation (LOD) are necessary to 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 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</u></p>	<p><u>It is agreed between Highways England and HBMCE that the issues HBMCE has raised have been broadly addressed.</u></p>

	<p>Position Statement at</p>	<p>Page 7</p>	<p>Paragraph 1.13(k)</p>	<p>in the first draft DCO of 200m for the western portal to be unjustified at this point.</p> <p>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.</p> <p>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 can provide clarification of these impacts through visualisations or written details.</p> <p>Position Statement at Deadline 9: No change. This topic remains</p>	<p>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.</p> <p>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 construction of each individual ring within the front shield. Therefore, any change in the alignment for a large diameter</p>	
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	deadline 9			<p>under discussion.</p> <p>The Scheme is in illustrative form which enables flexibility as to its end design which will not be determined until after a decision on the DCO application is made.</p>	<p>TBM can take between 200-300m to accommodate during tunnelling. This is why the 200m westerly deviation is sought at the western portal. 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.</p>	
3.12	<p>[RR-1897]</p> <p>[REP2-101]</p>	<p>Restriction of Future Archaeological Work in WHS</p> <p>Areas of the Scheme where further refinement or illustration of effect is required to avoid and/or</p>	<p>Paragraph 1.13 (k)</p>	<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 research could have an adverse impact upon the OUV of the WHS.</p> <p>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</p>	<p>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 protect the structural integrity of the tunnel. There are no restrictions intended elsewhere and restrictions over the tunnel will only be applied where the integrity of the tunnel would potentially be at risk.</p> <p>Restrictions will vary along the length of the tunnel, depending upon the depth of the tunnel below the surface. A summary of the restriction is confirmed in the final DAMS submitted at Deadline 9 [REP9-017], paragraph 5.2.11</p>	<p>It Is Agreed between Highways England and HBMCE that the issues HBMCE has raised have been broadly addressed.</p>

	<p>[REP2-100]</p>	<p><u>minimise harm to OUV and significance:</u></p> <p><u>Section 8.8</u></p>	<p><u>Bullet (m)</u></p>	<p><u>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><u>In HBMCE's Responses to the ExA's Written Questions, we stated that discussions continue with Highways</u></p>	<p><u>which includes restrictions on excavations below 0.6m in areas where the tunnel is shallow, and below 1.2m in areas where the tunnel is deeper. The restrictions also apply to specified types of development and specified changes in ground weight loading. The restriction would not prevent excavations from being undertaken below this depth but would require a promoter of future archaeological research to consult with 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, and to obtain Highways England's consent. The detail of the restrictions will be recorded on Wiltshire Council's Wiltshire and Swindon Historic Environment Record (WSHER) and National Trust's National Trust Historic Buildings Sites and Monuments Record (as required by paragraph 5.2.12 of the DAMS).</u></p> <p><u>Where archaeological research is identified requiring activity</u></p>	
	<p>[REP6-053]</p>	<p><u>Page 3</u></p>	<p><u>DCO2.26</u></p>			

	Position Statement at deadline 9			<p>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 within set limits to depth of excavations and setting out the process for agreement regarding excavations at greater depth, but these have not yet been resolved.</p> <p>Position Statement Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this document, but we will need to review a final version of that document before this can be confirmed.</p>	<p>restricted by the above proposed terms (such as by requiring excavations deeper than 0.6m or 1.2m, depending on the 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.</p>	
3.13	[REP2-101]	Provisions of the DCO		Appropriateness of some of the provisions of the draft DCO (in light	Highways England considers the application is sufficiently detailed	Other than the issues

	<p>[REP4-084]</p>		<p>Paragraph 192</p>	<p><u>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.</u></p> <p><u>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 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</u></p>	<p><u>to allow HBMCE to understand and comment on the Scheme.</u></p> <p><u>Section 4 of the OEMP, the final version of which was submitted at deadline 9, [REP9-013] 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 that will inform the detailed design of the Scheme. Requirement 4 of Schedule 2 of the draft DCO, again submitted at deadline 9, [REP9-003] secures the OEMP.</u></p> <p><u>Highways England has responded to Historic England's comments on the DCO at each relevant deadline. Historic England's Deadline 9 submission indicates it is broadly content with the draft DCO save for the matters raised in paragraphs 3.1.5 to 3.1.51. In respect of those matters Historic England understands the issues will have been addressed in</u></p>	<p><u>of 'convenient' and the reference to CEMPs being prepared 'substantially in accordance with the OEMP' it is Agreed between Highways England and HBMCE that the issues HBMCE has raised have been broadly addressed.</u></p>
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	<p>Position Statement at deadline 9</p>			<p>can be resolved.</p> <p>Position Statement at Deadline 9: HBMCE considers that Highways England are aware of our concerns in relation to this document, but we will need to review a final version of that document to confirm whether our issues have been addressed.</p>	<p>Highways England’s submissions up to deadline 9, save for the following where the parties do not agree:</p> <ul style="list-style-type: none"> • Article 6 – removal of Class D Part 16 permitted development rights within the World Heritage Site. Historic England would welcome the inclusion of Class D Part 16 within article 6(3) as proposed by the Examining Authority. The Applicant has considered the position and is of the view that if the removal of those permitted developments rights are desirable, the appropriate approach would be for the local planning authority to make an article 4 direction, under its existing powers. • Article 7 – Highways England maintain that limits of deviation ought to be exercisable when “necessary or convenient”. Historic England maintain 	
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					<p><u>the view they should be exercisable only where “necessary”;</u></p> <ul style="list-style-type: none"> • <u>Requirement 4(6) – Historic England recommend the deletion to the reference to the deletion of “substantially”, requiring the CEMPS to be in “accordance” with the preliminary works OEMP. Highways England consider it is appropriate for the CEMPs to be “substantially in accordance” with the preliminary works OEMP to reflect that the OEMP is a framework to be developed in to the CEMPs, and that the duties to consult and the requirements for the CEMPs to be approved by the Secretary of State reflect adequate safeguards. That this is the justified position is reflected in the fact that the use of “substantially” is standard drafting for</u> 	
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					CEMP or analogous provisions across made DCOs.	
3.14	[RR-1897] Position Statement at deadline 9	Role of HBMCE in consultation and approval and discharge of requirements	Paragraph 1.17	<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>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. We do not want to be consulted on every single matter, but without a full</p>	<p>Updated Deadline 6 documents – DAMS [REP6-013], OEMP [REP6-011] and dDCO [REP6-005] provided more clarity on the Role of HBMCE in consultation and approval. All documents have been further updated and submitted at deadline 9.</p> <p>Consultation with HBMCE on matters pertaining to its roles and responsibilities is secured in two key ways.</p> <p>1. Requirement 4 of Schedule 2 to the draft DCO (submitted at deadline 9) requires Highways England to carry out the Scheme in accordance with the Outline Environmental Management Plan (“OEMP”). The OEMP</p>	It is Agreed between Highways England and HBMCE that the issues HBMCE has raised have been broadly addressed.

				<p><u>understanding of the scope and hierarchy of documents we may have to request consultation on more matters than might otherwise be appropriate and proportionate. We consider that Highways England providing us with the document hierarchy/ matrix will assist us in making the necessary decisions regarding the extent of our consultation and engagement. 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. 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><u>Position Statement Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this topic, but we will need to review a final version of the DAMS and</u></p>	<p><u>requires the contractor to develop Construction Environmental Management Plans (“CEMP”) for the Scheme, which must be prepared in accordance with the principles of the OEMP.</u></p> <p><u>The OEMP requires the preliminary works CEMP to include for the preliminary works:</u></p> <ul style="list-style-type: none"> <u>• PW-CH1 – a Heritage Management Plan, prepared in consultation with Wiltshire Council and Historic England and, for sites within or affecting the WHS, HMAG, and approved by Wiltshire Council (in consultation with Historic England) prior to the part of the preliminary works to which it relates commencing;</u> <u>• PW-CH3 – Site Specific Written Schemes of Investigation, produced in consultation with Wiltshire Council and Historic England and, for sites within or affecting the WHS, HMAG, and approval by Wiltshire Council (in consultation with Historic England) prior to the part of the preliminary works to which it</u> 	
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				<p><u>OEMP before this can be confirmed.</u></p> <p><u>There remain minor elements of inconsistency with regards to cross referencing between the OEMP and dDCO consultation and the lack of agreed terms of reference in relation to the SDCG and our role and engagement in this.</u></p>	<p><u>relates commencing, to describe the mitigation measures that will be carried out:</u></p> <ul style="list-style-type: none"> <u>• PW-CH7 – Archaeological Method Statements, produced in consultation with Wiltshire Council and Historic England and, for sites within or affecting the WHS, HMAG, and approval from Wiltshire Council (in consultation with Historic England) prior to the part of the preliminary works to which it relates commencing,, to include protective fencing for identified heritage assets and appropriate archaeological mitigation measures;</u> <u>• PW-CH4 – design and method statements regarding fencing of heritage assets, produced in consultation with Wiltshire Council and Historic England and, for sites within or affecting the WHS, HMAG, and approval by Wiltshire Council (in consultation with Historic England) prior to the part of the preliminary works to which it relates commencing, to include measures to install temporary barrier fencing to limit land</u> 	
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					<p><u>disturbance at the western portal and eastern portal approaches:</u></p> <ul style="list-style-type: none"> • <u>PW-LAN1 (and also paragraph 4.5.3) – requires consultation with the members of HMAG and approval from The Authority prior to any fencing being installed within or affecting the WHS and consultation with Wiltshire Council on the fencing requirements to the Nile Clumps prior to the installation of fencing to protect retained vegetation within the WHS;</u> <p><u>In respect of the main works the OEMP requires the main works CEMP to include:</u></p> <ul style="list-style-type: none"> • <u>MW-CH1 – Heritage Management Plan based on the Detailed Archaeological Mitigation Strategy (see requirement 5 of Schedule 2 to the draft DCO (submitted at deadline 9)). The HMP shall be prepared in consultation with Wiltshire Council and Historic England and, for sites within or affecting the WHS, HMAG, and approved by Wiltshire Council (in consultation with Historic England) prior to the part</u>
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					<p><u>of the main works to which it relates commencing.</u></p> <ul style="list-style-type: none"> • <u>MW-CH3 (and also paragraph 4.5.3) requires consultation with the members of HMAG and approval from The Authority on the type of fencing within or affecting the WHS and WHS setting prior to the main works commencing.</u> • <u>MW-CH5 requires the development 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 Method Statements are to be developed in consultation with Wiltshire Council and Historic England and, for sites within or affecting the WHS, HMAG, and approved by Wiltshire Council (in consultation with Historic England) prior to the part of the main works to which it relates commencing.</u> • <u>MW-CH6 requires the preparation of Site Specific Written Schemes of Investigation</u> 	
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					<p><u>in respect of service/utility corridors requiring excavations, to avoid archaeological remains wherever possible and implement appropriate archaeological mitigation measures where impacts are unavoidable. SSWSIs are to be prepared in consultation with Wiltshire Council and Historic England and, for sites within or affecting the WHS, HMAG, and approved by Wiltshire Council (in consultation with Historic England) prior to the part of the main works to which it relates commencing;</u></p> <ul style="list-style-type: none"> • <u>MW-CH7 requires appropriate monitoring arrangements for all heritage assets during the construction programme, prepared in consultation with Wiltshire Council and Historic England and, for sites within or affecting the WHS, HMAG, and approved by The Authority prior to the part of the main works to which it relates commencing.</u> <p><u>2. Requirement 5 under</u></p>	
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					<p>Schedule 2 to the draft DCO submitted at deadline 9 [REP9-003] requires the Scheme to be carried out in accordance with the DAMS with HBMCE and the final version of which is submitted at deadline 9 [REP9-017]. Highways England has submitted a document that further clarifies relationship between the DAMS and the OEMP [AS-010].</p> <p>As explained above, in addition to the multiple obligations above, the OEMP contains obligations in section 4 to consult HBMCE on key aspects of the scheme design both within the WHS and outside of its boundary, as part of the SDCG.</p> <p>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 has been held to allow a detailed discussion to take place.</p>	
3.15	[REP2-101] and meeting of 18		Mapping Issues	The Summary of Written Representations submitted by	Highways England acknowledges the limitations of the mapping of	

	<p>June 2019</p>			<p>HBMCE [REP2-101], clarification of mapped detail is required where works are proposed adjacent to or abutting scheduled monuments.</p> <p>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 Monument boundaries, to enable Historic England to confirm that there would be no direct physical impact on the monuments.</p> <p>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this topic, but we will need to review a final version of the DAMS and OEMP as submitted at the close of examiantion Examination before this can be confirmed.</p>	<p>scheduled areas in the documentation relating to their scheduling. Highways England has reviewed the Scheme LiDAR dataset and the results of the comprehensive geophysical surveys across the Scheme, with the Scheme design and the mapped scheduled areas in order to ensure that the extent of scheduled areas can be accurately detailed in relation to proposed works and appropriate steps taken to protect them. Figure 12.1 and the drawings in Appendix D of the DAMS, which illustrate the preservation in situ areas (including Scheduled Monuments) and their associated protection zones, have taken into account both the LiDAR and geophysical survey information in their mapping and the defining of these protection zones. Highways England assures Historic England that the Scheme has been designed to avoid impacts to scheduled monuments.</p> <p>A number of measures are set out in the Outline Environmental</p>	<p>It is Agreed between Highways England and HBMCE that the issues HBMCE has raised have been broadly addressed in the Deadline 9 DAMS.</p>
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					<p><u>Management Plan (OEMP) as submitted at Deadline 9 [REP9-013] to ensure that archaeological assets are protected from haul routes and temporary construction works. Heritage assets outside the construction footprint for the retained cutting in the western approaches would be protected in situ.</u></p> <p><u>The final Detailed Archaeological Mitigation Strategy (DAMS) [as submitted at Deadline 9] provides further detail on those areas to be preserved in situ. Appendix D of the DAMS submitted at deadline 9 [REP9-017] includes drawings that illustrate the indicative areas for preservation of archaeological remains and their associated protection zones for Scheduled Monuments. The preparation of these diagrams has taken into account both the LiDAR and geophysical survey information in their mapping and the defining of the protection zones.</u></p> <p>—</p>	
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<p>3.16</p>	<p>Meeting 06/02/19 [REP2-100]</p>	<p>Paragraph 6.10.5</p>	<p>Listed buildings</p>	<p>Further comment to follow from HBMCE in written representations.</p> <p>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 I listed building is its designed and parkland landscape (the Grade II* Registered Park and Garden of Amesbury</p>	<p>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>It is agreed between HBMCE and Highways England that there is a difference of professional opinion on this matter and no further work is needed.</p>
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				<p><u>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>		
3.17	[REP2-101]	<p><u>Deposition of processed chalk arisings at Parsonage Down East</u></p>	<p><u>Paragraph 1.13(f)</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>The final Detailed Archaeological Mitigation Strategy (DAMS) issued at deadline 9; 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 and the OEMP, the final version of which was</u></p>	<p><u>It is Agreed between Highways England and HBMCE that the issues HBMCE has raised have been broadly addressed in the Deadline 9 DAMS and OEMP</u></p>

	<p>[REP6-053]</p>	<p>Page 26</p>	<p>CH.2.9</p>	<p>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 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.</p> <p>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this document, but we will need to review a final version of the DAMS before this can be confirmed.</p>	<p>submitted at deadline 9, 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 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 the HMP will be approved by Wiltshire Council, in consultation with HBMCE.</p> <p>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</p>	
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					<p><u>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>	
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4 Matters Under Discussion

1.1.1 [There are no matters under discussion between the parties.](#)

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) & Overarching Written Scheme of Investigation	<p>HBMCE request the detailed archaeological mitigation strategy (DAMS). Historic England request an Overarching Written Scheme of Investigation to accompany the DAMS.</p> <p>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 framework.’ It continues ‘We consider it essential</p>	<p>The draft Detailed Archaeological Mitigation Strategy (DAMS) has been developed in consultation with HBMCE, Wiltshire Council Archaeology Service and other members of the Heritage Monitoring and Advisory Group, with inputs from the Scientific Committee, which sets out the structured, iterative detailed archaeological mitigation strategy. The DAMS is rooted in a heritage research led framework [draft DAMS submitted at Deadline 6, [REP6-013 Section 4].</p> <p>-</p> <p>The draft DAMS was submitted to the Examination for the second deadline (DL2) [REP2-038]. Comments made 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</p>	Under Discussion
	[REP2-100]	Page 129	Paragraph 8.8(k)			

	[REP3-054]	Page 7	Paragraph 1.16	<p>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.'</p> <p>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</p>	<p>the DAMS is to be issued at deadline 7 which will address comments received at deadlines 5 and 6.</p> <p>The DAMS will be finalised prior to the end of the Examination and will be secured by Requirement 5 under Schedule 2 of the draft Development Consent Order (DCO) [REP6-005].</p> <p>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].</p>	
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	<p>Current position Statement</p>			<p>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.</p> <p>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.'</p> <p>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</p>		
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				<p>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 provide any further comments on in advance of 6th September deadline set by the ExA for receipt of a final version.</p> <p>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this document, but we will need to review a final version of that document before this can be confirmed.</p>		
4.2	[REP2-100]	'Management of the Scheme'	Paragraphs 7.6.123 – 131	HBMCE requests a Preliminary Outline Environmental Management Plan for preliminary works including archaeological mitigation. The	The REAC table 3.2a of the Outline Environmental Management Plan (OEMP) has been submitted as part of the DCO application, and provides sufficient	Under Discussion

	[REP4-086]	Comments on OEMP submitted at Deadline 3	Whole document	<p>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>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.</p> <p>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</p>	<p>information for the decision-making process at this stage and to allow ongoing consultation and comment on the Scheme with members of HMAG.</p> <p>An update of the OEMP has since been submitted at Deadline 6 9 [REP6REP9-011013]. Document [REP6-012] confirms changes made to the OEMP in response to comments received at deadlines 4 and 5 throughout the examination.</p> <p>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 it has been demonstrated that the Scheme has the necessary funding to allow the Scheme to be delivered once approved. Highways England has also provided information to HBCME regarding the timing of the preliminary works in relation to the award of the main works contract and appointment of the main works contractor. As a consequence, there is no risk of archaeology being undertaken and the Scheme not being taken forward subsequently.</p>	
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				<p>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.</p>	<p>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.</p>
	[REP4-085]	<p>HBMCE- Written summaries of oral submissions put at Issue Specific Hearings held between 4 and 14 June 2019</p>	<p>Sections 9-13, 15-19, 21-23.</p>	<p>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.</p>	<p>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 under Requirement 4 of Schedule 2 of the draft DCO [REP6-006]. The DAMS will be secured under Requirement 5 of the DCO [REP6-005].</p>
	[REP5-013]	<p>An updated version of the DCO</p>	<p>Second paragraph</p>	<p>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</p>	

	<p>Current Position -</p>		<p>a number of different discussions to draw to a conclusion. The discussions have 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.</p> <p>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</p>		
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				<p>construction-period temporary- infrastructure and reinstatement of- affected land post- construction.-</p> <p>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. 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.-</p> <p>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-</p>	
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				<p>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.</p> <p>We consider that these points are critical to resolve.</p> <p>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.</p> <p>We are also continuing to meet and discuss with Highways England in 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.</p> <p>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.</p> <p><u>Position statement at Deadline 9:</u> <u>HBMCE considers that Highways England should be in a position to</u></p>	
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				address our concerns in relation to this topic/document, but we will need to review a final version of that document before this can be confirmed.		
4.3	[REP2-100] Current Position	Paragraph 1.12(a), 7.5.1-3	Evaluation Reports	<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.</p> <p>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.</p> <p>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</p>	A full and comprehensive programme of archaeological evaluation surveys has been completed. 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]). The completed archaeological evaluation reports have been developed in consultation with HBMCE and Wiltshire Council Archaeology Service together with other members of the Heritage Monitoring and Advisory Group. 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 Chapter 6 and Appendix 6.8). No additional significant effects have been	Under Discussion

				<p>most recently submitted reports through the DAMS rather than revising these documents individually. We would 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.</p> <p><u>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this topic, but we will need to review a final version of the DAMS before this can be confirmed.</u></p>	<p>identified.</p> <p>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].</p> <p>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>EP</u></p>	
4.4	[RR-1897][RR-1897]	Page 2	Detail of key elements of Infrastructure and provision of visualisation	HBMCE stated in the Relevant Representations [RR-1897] 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	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	Under Discussion

	<p>[REP4-085]</p> <p>Current Position</p>	<p>Section 9.3, page 28</p>	<p>s</p> <p>Paragraph 9.2.1</p>	<p>portal and its extension, the eastern tunnel portal, the articulation and form of open cutting retaining walls and the design, construction, form and appearance of Green Bridge 4.</p> <p>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.</p> <p>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</p>	<p>(Chapter 7 [APP-045]) and Cultural Heritage Chapters (Appendix 6.9 [APP-248]) of the ES. Design and visual representations will be developed through the detailed design process.</p> <p>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 HBMCE. The draft OEMP [REP6REP9-011013] 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 including <u>specific design principles relating to the portal and its associated infrastructure.</u></p> <p>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].</p> <p>With reference to Interim Advice Note 135/10 which forms the basis of the Landscape and Visual Impact</p>	
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				<p>submitted by 09 August. On that basis this element remains Under Discussion until visualisations have been submitted that address those comments to our satisfaction.</p> <p><u>Position Statement at Deadline 9: HBMCE can confirm that the additional visualisations submitted in response to our and the Examining Authority's requests have provided a much more robust baseline for understanding the visual impacts and to consider what further opportunities might be achieved through mitigation measures linked to design.</u></p>	<p>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 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.</p> <p>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.</p> <p>Highways England has discussed with HBMCE the provision of additional visualisations and agreed a set of information which will be submitted at deadline 7.</p>	
4.6	[RR-1897	Outstanding Matters		<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</p>	<p>Highways England considers the application is sufficiently detailed to allow Historic England to understand and comment on the Scheme.</p>	Under Discussion

	<p>REP2-100]</p> <p>[REP4a-008]</p>	<p>Executive Summary and Conclusion</p> <p>Historic</p>	<p>8.8(i)</p> <p>Paragraph</p>	<p>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>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.'</p>	<p>The Scheme's proposals for changes to existing, or creation of new, public rights-of-way, are shown on the Rights of Way and Access Plans [APP-009] and secured by the draft Development Consent Order [APP-020REP9-003]. The design of these elements of the scheme will be developed through the detailed design process in consultation with HBMCE.</p> <p>NMU routes proposed by the Scheme 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>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 (reference NMC-04) and, in a procedural decision issued on 27 September 2019, has now accepted it NMC-04 as forming part of the application. This turning head would be</p>	
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	<p>Current Position</p>	<p>England's- Position on- Highways- England- proposals</p>	<p>14</p>	<p>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.'</p> <p>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 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.</p>	<p>located 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, which will be shown in revised General Arrangement Drawings issued prior to the close of the Examination. This consultation runs until 27 August. The DAMS will be updated prior to the end of the Examination to account for this.</p> <p>Section 4 of the OEMP [REP6-011] has been developed in consultation with HBMCE to set out the design vision for the Scheme and 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 multiple commitments in respect of public rights of way.</p> <p>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</p>	
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				<p>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this topic, but we will need to review a final version of the OEMP before this can be confirmed.</p>	<p>that outlines appropriate ways of achieving the goal. This guidance will take the form of:</p> <ul style="list-style-type: none"> material palettes; examples of design typologies that are agreed to be inappropriate; and examples of design typologies that are agreed to be appropriate. <p>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. Specific design commitments, including in relation to PRowS and NMU routes, are contained in Table 3.2b of the OEMP.</p> <p>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 vehicles. It would be treated with a new visually recessive durable surface. The surplus areas of redundant road surface</p>	
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					<p>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.</p> <p>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].</p>	
4.7	[RR-1897]	<p>Detail of key engineering elements of the Scheme</p> <p>Areas of the</p>	<p>Paragraphs</p>	<p>HBMCE states that there is an absence of detailed proposals for lighting, signage, fencing, drainage, balance ponds, landscaping including tree planting in and adjacent to the WHS;</p> <p>HBMCE state that detail is required in</p>	<p>Highways England considers that the application has provided sufficient information to allow 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</p>	Under Discussion

	<p>[REP2-101]</p>	<p>Scheme where further refinement or illustration of effect is required to avoid and/or minimise harm to OUV and significance:</p>	<p>1.13 (a) (b) (c) (d) and (e)</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>A greater degree of precision is needed in relation to the actual positioning of the tunnel portals given the sensitivity of the landscape.</p>	<p>of the Scheme.</p> <p>Further details of junctions, the tunnel approaches and portals (including engineering design, levels in 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.</p> <p>The OEMP [REP9REP9-011013] 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:</p> <p>a) The tunnel service buildings (Work No.1D(ii)); b) Portals structures (Work Nos. 1E(ii)</p>	
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	<p>[REP6-053]</p>	<p>ExA question DCO.2.51— Requirement 4, OEMP</p>	<p>Page 10</p>	<p>Historic England considers the limits of lateral deviation westwards in the first draft DCO of 200m for the western portal to be unjustified at this point.</p> <p>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.</p> <p>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</p>	<p>and 1G(iii)), retaining walls (part of Work Nos. 1D(ii) and 1H(ii)) and Green Bridge Four (Work No.1d(ii)); and</p> <p>e) Public rights of way, including pedestrian, cycling and non-motorised user provision and wayfinding including surfacing, materials, fencing and gating.</p> <p>Outside of the World Heritage Site Highways England will consult key stakeholders, including HBMCE, on the external appearance of the following:</p> <p>a) Signing and lighting at the new Longbarrow junction (Work No.1C(ii)); and</p> <p>b) Signing and lighting at the Countess junction (Work No.1H(iv)).</p> <p>Longbarrow Junction</p> <p>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 intersection of the A303 and A360</p>	
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	<p>Current position</p>			<p>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.</p> <p>As noted above, the OEMP remains the focus of discussion on the detail of the Scheme. We would expect the detailing of key engineering elements to be covered as part of this discussion.</p> <p><u>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this topic, but we will need to review a final version of the OEMP before this can be confirmed.</u></p>	<p>alignments while at the same time minimising impact on the WHS and other environmental receptors.</p> <p>Tunnel Approaches and Portals</p> <p>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.</p> <p>Levels in relation to existing Topography</p> <p>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)</p>	
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					<p>[APP-011] which show both existing and proposed levels at selected cross sections along the Scheme. Vertical levels of deviation (Article 7 of the draft development consent order [REP9-003][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.</p> <p>Approach to Materials selection and surface treatment</p> <p>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 [REP6REP9-011013] 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</p>	
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					<p>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.</p> <p>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 the Scheme before it is commenced, and which also provides for consultation with Historic England.</p> <p>Lighting</p> <p>The majority of the Scheme would not be lit. There will be no external road lighting within the WHS outside the tunnel or Green Bridge 4 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</p>	
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					<p>with a modern system that will reduce light spill. The lighting under Green Bridge No. 4 will only operate between dawn and dusk, be able to be varied, and will be designed to minimise light spill outside of the bridge footprint during the day time and will be dimmer controlled at dusk and dawn to avoid sudden bursts of light emitting into the landscape at these specific times of the day. There will be no lighting on any PRow within the Scheme. This These lighting is commitments are provided for in the OEMP [REP6REP9-011013], and paragraph 4 of Schedule 2 of the draft development consent order [REP6-005] requires the Scheme to be carried out in accordance with the OEMP.</p> <p>Green Bridge No 4</p> <p>Highways England has committed, via the OEMP [REP6REP9-011013] 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</p>	
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					<p>design. Compliance with the OEMP is secured via requirement paragraph 4 of Schedule 2 of the draft development consent order [REP6-005].</p> <p>Tunnel Canopies</p> <p>Highways England has prepared an update to the OEMP [REP6-011] which contains additional design commitments (including in relation to tunnel canopy (see item D-CH17)), 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 within the World Heritage Site. Compliance with the OEMP is secured via paragraph 4 of Schedule 2 of the draft development consent order [REP6-005].</p>	
4.8	{RR-1897REP2-101}	Page 2	<p>Strategy for the Environmental Management of Temporary and</p>	<p>HBMCE states that there is an absence of detailed proposals for construction period temporary infrastructure and reinstatement of affected land post-construction. HBMCE stated in the Written Representation [REP2-100] that there a need for a robust strategy for the</p>	<p>The strategy for the environmental management of the scheme is provided within the Outline Environmental Management Plan (OEMP) [REP6REP9-011013]. 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</p>	Under Discussion

	[REP2-100]	<p>Management of the Scheme (OEMP)</p> <p>Executive Summary and Conclusion</p>	<p>Permanent elements of the Scheme</p> <p>7.6.128</p> <p>Paragraph 8.8(1)</p>	<p>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 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.</p> <p>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</p>	<p>prepared in accordance with the principles of the OEMP in order that it is substantially in accordance with the OEMP. This includes the development of various subplans outlined in items including PW-CH1, 3 and 7 (Preliminary Works Heritage Management Plan, SSWSIs and archaeological method statements) and PW-NOI3 (Preliminary Works Noise and Vibration Management Plans) and for the main works listed within MW-G7:</p> <ol style="list-style-type: none"> 1. Site Waste Management Plan; 2. Emergency Preparedness and Response Plan; 3. Heritage Management Plan; 4. Ground Movement Monitoring Strategy 5. Landscape and Ecology Management Plan; 6. Arboricultural Mitigation Strategy; 7. Noise and Vibration Management Plan; 8. Noise Insulation and Temporary Rehousing Policy; 9. Soils Management Strategy; 10. Water Management Plan; 11. Groundwater Management Plan; 12. Materials Management Plan; and 13. Traffic Management Plan. 	
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	<p>Current position</p>			<p>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.</p> <p>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 consideration of whether or not these issues have been resolved.</p> <p>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this topic, but we will need to review a final version of the OEMP before this</p>	<p>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 [REP6REP9-005003], 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.</p> <p>The OEMP also now includes Design Principle PG-06 which requires all temporary works to be designed and undertaken to minimise their visual impact.</p> <p>The OEMP also confirms that Site-Specific Written Schemes of Investigation will be produced in consultation with Wiltshire Council and Historic England, and for sites within or affecting the WHS, 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</p>	
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				<p>can be confirmed.</p>	<p>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.</p> <p>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.</p>	
4.9	[RR-1897]	<p>Areas of the Scheme where further refinement or illustration of effect is required to avoid and/or minimise harm to OUV and significance</p>		<p>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.</p>	<p>The Tunnel Limits of Deviation (LOD) are necessary to 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 eastern end of the tunnel should this be necessary by the contractor.</p> <p>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,</p>	Under Discussion

	<p>REP2-101]</p> <p>Page 5</p> <p>Page 7</p> <p>Current Position</p>	<p>Paragraph 1.13(d)</p> <p>Paragraph 1.13(k)</p>	<p>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.</p> <p>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.</p> <p>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</p>	<p>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.</p> <p>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 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</p>	
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				<p>discussion so that Highways England can provide clarification of these impacts through visualisations or written details.</p> <p>Position Statement at Deadline 9: No change. This topic remains under discussion.</p>	<p>why the 200m westerly deviation is sought at the western portal.</p> <p>The document 8.31 – Comments on the DAMS and on any further information requested by the ExA and received to Deadline 3 – explains limits of deviation in further detail at page 13-122.</p> <p>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.</p>	
4.10	<p>[RR-1897]</p> <p>[REP2-101]</p>	<p>Restriction of Future Archaeological Work in WHS</p> <p>Areas of the Scheme where further refinement or</p>	<p>Paragraph 1.13 (k)</p>	<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 research could have an adverse impact upon the OUV of the WHS.</p> <p>HBMCE stated in the Summary of Written Representations [REP2-101] that detail is needed (in relation to</p>	<p>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 protect the structural integrity of the tunnel. There are no restrictions intended elsewhere and restrictions over the tunnel will only be applied where the integrity of the tunnel was <u>would potentially be at risk.</u></p> <p>Restrictions will vary along the length of the tunnel, depending upon the depth of the tunnel below the surface. <u>A summary</u> The detail of the restriction is confirmed in <u>the final DAMS submitted at Deadline 9-</u></p>	Under Discussion

	[REP2-100]	<p>illustration of effect is required to avoid and/or minimise harm to OUV and significance:</p> <p>Section 8.8</p>	<p>Bullet (m)</p>	<p>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.</p> <p>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.</p>	<p>[REP9-017], paragraph 5.2.11 Highways England's response to ExA question CH.1.27 [REP2-025] which includes states restrictions on 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 restrictions also apply to specified types of development and specified changes in ground weight loading. The restriction would not prevent excavations from being undertaken below this depth but would require a promoter of future archaeological research to consult with 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, and to obtain Highways England's consent. The detail of the restrictions will be recorded on Wiltshire Council's Wiltshire and Swindon Historic Environment Record (WSHER) and National Trust's National Trust Historic Buildings Sites and Monuments Record (as required by paragraph 5.2.12 of the DAMS).</p> <p>Where archaeological research is identified requiring activity restricted by the above proposed terms (such as by requiring excavations deeper than 0.6m or</p>	
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	<p>[REP6-053]</p> <p>Current position</p>	<p>Page 3</p>	<p>DCO2.26</p>	<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 within set limits to depth of excavations and setting out the process for agreement regarding excavations at greater depth, but these have not yet been resolved.</p> <p><u>Position Statement Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this document, but we will need to review a final version of that document before this can be confirmed.</u></p>	<p>1.2m, depending on the 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.</p>	
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<p>4.11</p>	<p>[REP2-101]</p> <p>[REP4-084]</p>	<p>Provisions of the DCO</p>	<p>Paragraph 1.16</p> <p>Paragraph 192</p>	<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 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.¹</p>	<p>Highways England considers the application is sufficiently detailed to allow HBMCE to understand and comment on the Scheme.</p> <p>Section 4 of the OEMP [REP6REP9-011013] 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 that will inform the detailed design of the Scheme. Requirement 4 of Schedule 2 of the draft DCO [REP6REP9-005003] secures the OEMP.</p> <p>Highways England has responded to Historic England's comments on the DCO at each relevant deadline. Historic England's Deadline 9 submission indicates it is broadly content with the draft DCO save for the matters raised in paragraphs 3.1.5 to 3.1.51. In respect of those matters Historic England understands the issues will have been addressed in Highways England's submissions up to deadline 9, save for the following where the parties do not agree:</p>	<p>Under Discussion</p>
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	<p>Current position</p>			<p>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.</p> <p><u>Position Statement at Deadline 9: HBMCE considers that Highways England are aware of our concerns in relation to this document, but we will need to review a final version of that document to confirm whether our issues have been addressed.</u></p>	<p>— Article 6 — removal of Class D Part 16 permitted development rights within the World Heritage Site. Historic England would welcome the inclusion of Class D Part 16 within article 6(3) as proposed by the Examining Authority. The Applicant has considered the position and is of the view that if the removal of those permitted developments rights are desirable, the appropriate approach would be for the local planning authority to make an article 4 direction, under its existing powers.</p> <p>— Article 7 — Highways England maintain that limits of deviation ought to be exercisable when “necessary or convenient”. Historic England maintain the view they should be exercisable only where “necessary”.</p> <p>— Requirement 4(6) — Historic England recommend the deletion to the reference to the deletion of “substantially”, requiring the CEMPS to be in “accordance” with the preliminary works OEMP. Highways England consider it is appropriate for the CEMPs to be “substantially in accordance” with</p>	
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					<p>the preliminary works OEMP to reflect that the OEMP is a framework to be developed in to the CEMPs, and that the duties to consult and the requirements for the CEMPs to be approved by the Secretary of State reflect adequate safeguards. That this is the justified position is reflected in the fact that the use of “substantially” is standard drafting for CEMP or analogous provisions across made DCOs.</p> <p>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].</p>	
4.12	[RR-1897]	Role of HBMCE in consultation and approval	Paragraph 1.17	Adequacy of measures for consultation and engagement of HBMCE in the Discharge of Requirements — in light of the impact	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	Under Discussion

	<p>Current position</p>	<p>and discharge of requirements</p>	<p>on the WHS and archaeology.</p> <p>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. We do not want to be consulted on every single matter, but without a full understanding of the scope and hierarchy of documents we may have to request consultation on more matters than might otherwise be appropriate and proportionate. We consider that Highways England providing us with the document hierarchy/ matrix will assist us in making the necessary decisions regarding the extent of our consultation and engagement.</p> <p>Due to the international importance of the WHS, there is a greater need for</p>	<p>approval. All</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 [REP6-005] requires Highways England to carry out the Scheme in accordance with the Outline Environmental Management Plan (“OEMP”), updated at deadline 6 [REP6-011]. The OEMP requires the contractor to develop Construction Environmental Management Plans (“CEMP”) for the Scheme, which 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 the members of HMAG, HBMCE and Wiltshire Council Archaeological Service; • PW-CH3 – Site Specific Written Schemes of Investigation, produced in consultation with the members of HMAG, HBMCE and Wiltshire Council Archaeological Service to describe the 	
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				<p>us to have certainty over the safeguards so that we can have the assurance over what is provided. 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</p> <p><u>Position Statement Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this topic, but we will need to review a final version of the DAMS and OEMP before this can be confirmed.</u></p>	<p>mitigation measures that will be carried;</p> <ul style="list-style-type: none"> • <u>PW-CH4</u> — <u>Method Statements, produced in or affecting consultation with the members of HMAG, HBMCE and Wiltshire Council Archaeological Service for works within the WHS, to include protective fencing for identified heritage assets and appropriate archaeological mitigation measures;</u> • <u>PW-CH5</u> — <u>design and method statements regarding Site Specific Written Schemes of Investigation, produced in consultation with the members of HMAG, HBMCE and Wiltshire Council Archaeological Service to include measures to install temporary barrier fencing to limit land disturbance at the western portal and eastern portal approaches;</u> • <u>PW-CH6</u> — <u>Site Specific Written Schemes of Investigation, developed in consultation with the members of HMAG, HBMCE and Wiltshire Council Archaeological Service 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;</u> • <u>PW-LAN1 (and also paragraph</u> 	
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					<p>4.5.3) — requires consultation with the members of HMAG, HBMCE and Wiltshire Council Archaeological Service prior to the installation of fencing to protect retained vegetation within the WHS;</p> <p>In respect of the main works the OEMP requires the main works CEMP to include:</p> <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 the members of HMAG, HBMCE and Wiltshire Council Archaeological Service, indicating how the historic environment is to be protected in a consistent and integrated manner. • — MW-CH3 (and also paragraph 4.5.3) requires of consultation with the members of HMAG, HBMCE and Wiltshire Council Archaeological Service 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; • — MW-CH5 requires the development in consultation with the members of HMAG, HBMCE and 	
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					<p>Wiltshire Council Archaeological Service 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;</p> <ul style="list-style-type: none"> • MW-CH6 requires the preparation, in consultation with the members of HMAG, HBMCE and Wiltshire Council Archaeological Service 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 consultation with the members of HMAG, HBMCE and Wiltshire Council Archaeological Service for works within the WHS. <p>2. Requirement 5 under Schedule 2 to the draft DCO [APP-020 [REP9-003] requires the Scheme to be carried out in</p>	
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					<p>accordance with the Detailed Archaeological Mitigation Strategy, which is being developed in consultation with HBMCE [REP9-017]. Highways England has submitted a document that further clarifies relationship between the Detailed Archaeological Mitigation Strategy and the OEMP [AS-010].</p> <p>As explained above, in addition to the multiple obligations above, the OEMP submitted at Deadline 3 and the updated version of the OEMP submitted at Deadline 6 [REP6-011] contains new obligations in section 4 to consult HBMCE on key aspects of the scheme design both within the WHS and outside of its boundary, as part of the SDCG. 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 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</p>	
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					<p>relevant works commencing-</p> <p>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.</p>	
4.13	[REP2-101] and meeting of 18 June 2019		<p>Mapping Issues</p> <p>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-</p> <p>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 Monument boundaries, to</p>	<p>Highways England acknowledges the limitations of the mapping of scheduled areas in the documentation relating to their scheduling. Highways England has reviewed the Scheme LiDAR dataset and the results of the comprehensive geophysical surveys across the Scheme, with the Scheme design and the mapped scheduled areas in order to ensure that the extent of scheduled areas can be accurately detailed in relation to proposed works and appropriate steps taken to protect them. Figure 12.1 and the drawings in Appendix D of their DAMS, which illustrate the preservation in situ areas (including Scheduled Monuments) and their associated protection zones, have taken into account both the LiDAR</p>	Under Discussion	

				<p>enable Historic England to confirm that there would be no direct physical impact on the monuments.</p> <p>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this topic, but we will need to review a final version of the DAMS and OEMP before this can be confirmed.</p>	<p>and geophysical survey information in their mapping and the defining of these protection zones. Highways England assures Historic England that the Scheme has been designed to avoid impacts to scheduled monuments.</p> <p>A number of measures are set out in the Outline Environmental Management Plan (OEMP) as submitted at Deadline 8 [REP9-013] to ensure that archaeological assets are protected from haul routes and temporary construction works. Heritage assets outside the construction footprint for the retained cutting in the western approaches would be protected in situ.</p> <p>The Detailed Archaeological Mitigation Strategy (DAMS) [as submitted at Deadline 8] provides further detail on those areas to be preserved in situ. Appendix D of the DAMS submitted at deadline 9 [REP9-017] includes drawings that illustrate the indicative areas for preservation of archaeological remains and their associated protection zones for Scheduled Monuments. The preparation of these diagrams has taken into account both the LiDAR and geophysical survey information in their mapping and the</p>	
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					<p>defining of the protection zones.</p> <p>The requirement for Scheduled Monument Consent is disappplied 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 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.</p>	
4.14	Meeting-06/02/19 [REP2-100]	Paragraph 6.10.5	Listed buildings	<p>Further comment to follow from HBMCE in written representations.</p> <p>HBMCE has commented on the</p>	<p>Highways England acknowledges Historic England's comments, but stands by its Setting Assessment and EIA. Highways England continue to discuss the design</p>	Under Discussion

			<p>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 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</p>	<p>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>	
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				<p>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.</p>		
4.15	[REP2-101]	Deposition of processed chalk arisings at Parsonage Down East	Paragraph 1.13(f)	<p>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:-</p> <ul style="list-style-type: none"> the preservation of archaeological remains; the impacts of temporary works compounds and haul routes; and long term impacts on the significance of designated heritage assets, where this part of the landscape forms part of their setting. 	<p>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.</p> <p>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 integrated manner including in relation to the effects of construction (including placement of fill). Similarly there is a</p>	Under Discussion
	[REP6-053]	Page 26	CH.2.9	<p>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,</p>		

				<p>the 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.</p> <p>Position Statement at Deadline 9: HBMCE considers that Highways England should be in a position to address our concerns in relation to this document, but we will need to review a final version of the DAMS before this can be confirmed.</p>	<p>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 the HMP will be approved by Wiltshire Council, in consultation with HBMCE where the works the subject of the HMP would otherwise require scheduled monument consent.</p> <p>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.</p>	
4.16	{REP2-100}		Application of Preserving Archaeological Remains Tiered	<p>HBMCE has provided advice to Highways England regarding its development of a strategy under the Scheme to ensure that archaeological remains at Blick Mead would be preserved in line with published</p>	<p>The Scheme alignment has been optimised past the Blick Mead archaeological site, to avoid land take and to keep the road at existing grade. Ground</p>	Under Discussion

	<p>[REP4-085]</p>	<p>Mesolithic Site at Blick Mead</p> <p>Page 24</p>	<p>Assessment at Blick Mead</p> <p>Paragraphs 7.6.77—7.6.93</p> <p>[Para 7.3.5]</p>	<p>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> <ul style="list-style-type: none"> a) Understanding the state of preservation of archaeological material, as a contribution to the assessment of a site’s significance; and b) 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. <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</p>	<p>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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				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.		
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45 Matters Not Agreed

4.1.1 ~~There are no matters Not Agreed at the present time.~~

<u>Issue Ref</u>	<u>Doc Ref</u>	<u>Paragraph Reference</u>	<u>Sub-section</u>	<u>HBMCE Comment</u>	<u>Highways England Response</u>	<u>Status</u>
5.1	REP9-038	2.4.1 - 2.4.5		<u>The proposed compulsory acquisition of land will have a bearing on HBMCE land ownership. English Heritage Trust has led on this on our behalf.-</u>	<u>Highways England opposes EHT's objection in respect of the PRoW at the visitor centre.</u>	<u>Not Agreed</u>

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5.2	REP9-038	3.1.6		HBMCE considers it is not appropriate for the undertaker to exercise limits of deviation on the basis of it being “convenient” to do so.	Please see Highways England’s responses to Historic England’s Deadline 9 Submissions, submitted at Deadline 10.	Not Agreed
5.3	REP9-038	3.1.47 – 3.1.48		HBMCE considers that reference to “substantially” with regard to “preliminary works CEMP must be prepared substantially 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.	Please see Highways England’s responses to Historic England’s Deadline 9 Submissions, submitted at Deadline 10.	Not Agreed

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