



Historic England

WRITTEN REPRESENTATIONS

ON BEHALF OF THE

HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND

(HISTORIC ENGLAND)

(“HBMCE”)

Application by

**Highways England for an Order granting Development Consent for the A30
Chiverton to Carland Cross Scheme**

PINS Reference No: TR010026

HBMCE Reference No: 30CC-SP005

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1. INTRODUCTION

- 1.1. The following statement has been prepared by the Historic Buildings and Monuments Commission for England (HBMCE) for the Examination of Highways England's application for a Development Consent Order (DCO) for the nationally significant infrastructure project to construct the A30 Chiverton Cross to Carland Cross Scheme (the 'Scheme').
- 1.2. HBMCE has been involved through engagement with Highways England's development of the Scheme since 2015.
- 1.3. In accordance with the National Networks National Policy Statement which is relevant in the determination of this Scheme, the Scheme should avoid or minimise the conflict between the conservation of any heritage assets affected and any aspect of the proposal. HBMCE's engagement and advice in relation to this Scheme has focused on assisting Highways England in this regard due to the potential for adverse impacts on the significance of the historic environment arising from the detail of the Scheme. At present, a range of matters relating to potential adverse impacts remain under discussion between the parties.
- 1.4. HBMCE continues in discussions with Highways England in relation to the content of a Statement of Common Ground (SoCG) which is in the process of being compiled by Highways England on behalf of both parties.
- 1.5. This Written Representation sets out HBMCE's position in relation to the significance of the designated heritage assets affected by the Scheme that it has engaged on, and the impact of the Scheme on the significance of those assets, including any contribution made by their settings to their significance.

2. ROLE OF THE HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND

2.1. The Historic Buildings and Monuments Commission for England is generally known as Historic England. However due to the potential for confusion in relation to “HE” (Highways England and Historic England), we have used “HBMCE” in our formal submissions to the examination to avoid confusion. HBMCE was established with effect from 1 April 1984 under Section 32 of the National Heritage Act 1983. The general duties of HBMCE under Section 33 are as follows:

“...so far as is practicable:

- (a) to secure the preservation of ancient monuments and historic buildings situated in England;
- (b) to promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and
- (c) to promote the public’s enjoyment of, and advance their knowledge of, ancient monuments and historic buildings situated in England and their preservation”.

We also have a role in relation to maritime archaeology under the National Heritage Act 2002 and advise Government in relation to World Heritage Sites and compliance with the 1972 Convention Concerning the Protection of the World Cultural and National Heritage.

2.2. HBMCE’s sponsoring department is the Department for Digital, Culture, Media and Sport, although its remit in conservation matters intersects with the policy responsibilities of a number of other government departments, particularly the Ministry of Housing, Communities and Local Government, with its responsibilities for land-use planning matters.

2.3. HBMCE is a statutory consultee providing advice to local planning authorities on certain categories of applications for planning permission and listed

building consent, and is also a statutory consultee on all Nationally Significant Infrastructure Projects (NSIP). Similarly HBMCE advises the Secretary of State on those applications, subsequent appeals and on other matters generally affecting the historic environment. It is the lead body for the heritage sector and is the Government's principal adviser on the historic environment as well as administering and advising the Secretary of State on applications for Scheduled Monument Consent (SMC), although in the case of an NSIP the DCO negates the need for a separate SMC.

- 2.4. In light of its role as a statutory consultee, HBMCE encourages pre-application discussions and early engagement on projects to ensure informed consideration of heritage assets and to ensure that the possible impacts of proposals on the historic environment are taken into account. In undertaking pre-application discussions for a scheme such as this, the key issue for HBMCE is ensuring that the significance and the impact on that significance of any heritage assets that may be affected is fully understood; that any proposals to avoid, or mitigate that impact have been considered and can be secured, and that the decision maker is fully informed and can be satisfied that there is clear and convincing justification for any harm with great weight given to the asset's conservation. Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss.

3. SCOPE OF WRITTEN REPRESENTATION

- 3.1. As stated in our Section 56 Relevant Representation, HBMCE's interest in this scheme is focused upon the following designated heritage assets:
- (a) The Carland Cross barrow cemetery, including; b, c, d, and e;
 - (b) Scheduled Monument Warren's Barrow;
 - (c) Scheduled Monument Round barrow cemetery 420m north east of Higher Ennis Farm;
 - (d) Scheduled Monument Two bowl barrows 290m and 375m north of Higher Ennis Farm;

- (e) Scheduled Monument Bowl barrow 500m north west of Higher Ennis Farm;
- (f) Scheduled Monument Prehistoric long barrow and four round barrows 580m and 750m south west of Mitchell Farm;
- (g) Scheduled Monument The Four Burrows;
- (h) Scheduled Monument Bowl barrow 100m south west of Callestick Vean;
- (i) Scheduled Monument Hillfort 250m south west of Tresawsen;
- (j) Scheduled Monument Bowl barrow 130m south east of Penglaze;
- (k) Scheduled Monument The Three Burrows;
- (l) Scheduled Monument Prehistoric long barrow and four round barrows 580m and 750m south west of Mitchell Farm;
- (m) Cornwall and West Devon Mining Landscape World Heritage Site;
- (n) Grade II Listed milestones at SW771486 and SW845539;
- (o) Grade II Listed Church of St Peter at Chiverton;
- (p) Grade I Listed building, Trerice.

The relevant entries on the National Heritage List for England for these designated heritage assets are set out in Appendix A.

3.2. We will describe below how the proposals physically interact with the monuments, their significance, and the impact of the scheme upon the monuments. We will address each monument individually in a narrative discussion; however, to avoid repetition in the case of barrows and the wider barrow cemetery at Carland Cross we will include a separate consideration of both significance and impact.

3.3. The scope of HBMCE's written representation will include:

- a summary of the proposals;
- an outline of HBMCE's consultation and advice on the proposals to date;
- an update on the current production of the Statement of Common Ground;

- a brief description of the designated heritage assets affected (as noted above) and an assessment of their significance (including that contribution made by their settings) and our assessment of the impact of the Scheme;
- HBMCE's comments and observations on the Environmental Statement (ES), including our advice regarding the likely effectiveness and suitability of the proposed mitigation measures;
- HBMCE's comments and observations on the draft DCO.

4. THE PROPOSALS AND HBMCE'S INVOLVEMENT WITH THE SCHEME

4.1. HBMCE Consultation and Advice to Date

4.1.1. HBMCE expect a summary of the consultation undertaken between HBMCE and the Applicant will be set out in the Statement of Common Ground (SoCG), which remains in discussion between the parties.

4.1.2. HBMCE was approached by Highways England (the Applicant) in early 2015, and we understood at that time that they proposed to dual a section of the A30 between Chiverton and Carland Cross. The exact details of the route, the design, and matters relating to construction compounds, extent of impact on the historic environment and proposed mitigation were at that point the subject of consultation through a series of Value Management Workshops and following this process our first response was provided on 22nd January 2016 in response to the request for a Scoping Opinion.

We provided further advice on the Scoping of the EIA on the 8th September 2017 and on the 26th March 2018 we responded to the proposed route selection, registering our concerns, in particular with reference to the Carland Cross scheduled barrows.

4.1.3. At that time, it was understood that the Scheme would impact on the above named scheduled monuments and would result in significant environmental impacts to the Carland Cross barrow group consisting of the three scheduled

monuments identified above, and advised they had potential to cause harm to the significance of these designated heritage assets.

4.1.11. Consultation has subsequently continued through a series of meetings with Highways England and their consultants.

4.1.12. In November 2018, HBMCE provided written representations to the Planning Inspectorate as part of the pre-examination process.

4.1.13. On 27th September 2018 we understand that the application for a Development Consent Order for the proposed dualling of the A30 between Chiverton and Carland Cross was accepted for examination by the Planning Inspectorate.

5. STATEMENT OF COMMON GROUND (SoCG)

5.1. Discussion with the Applicant regarding the draft Statement of Common Ground (SoCG) continues at the time of submission of this Written Representation. An initial meeting was conducted on 11th March 2018 and HBMCE have, today, received a draft SoCG. We will now be reviewing its content. We understand additional photomontages are being produced to address our comments in relation to The Church of St Peter and the scheduled round barrow cemetery at Carland Cross. These will add clarity on the extent of impact on the significance of the listed church and the extent to which the impact upon the barrow cemetery at Carland Cross can be minimised. This will aid in identifying how optimal, appropriate mitigation will be secured. HBMCE considers that all of these items are required to inform its, and the Examining Authority's, assessment of the impact of the Scheme.

6. ASSESSMENT OF SIGNIFICANCE AND IMPACT ON DESIGNATED HERITAGE ASSETS AFFECTED BY THE SCHEME

6.1. Statement of Approach

6.1.1. Under this section HBMCE sets out the significance of, and its assessment of the impact on the designated heritage assets affected by the Scheme. We

will address each individual asset in turn, however, their cumulative significance and the relationships between individual schedulings are such that we will take a more holistic overview of the significance of the barrows and of each barrow cemetery as a whole.

6.2. The Carland Cross round barrow cemetery as a whole.

6.2.1. The barrows at Carland Cross form part of a more extensive barrow cemetery.

This includes the following scheduled monuments: Warren's Barrow; round barrow cemetery 420m north east of Higher Ennis Farm; two bowl barrows 290m and 375m north of Higher Ennis Farm; and prehistoric long barrow and four round barrows 580m and 750m south west of Mitchell Farm. It also includes non-designated barrows and further scheduled barrow groups to the south east. It is likely that the cemetery was once more extensive and incorporated a number of barrows that have been destroyed through cultivation or development, including the existing A30.

Often occupying prominent locations, barrows are a major historic element in the modern landscape and their considerable variation of form and longevity as a monument type provide important information on the diversity of beliefs and social organisations amongst early prehistoric communities.

The significance of the asset.

6.2.2. Location is highly significant for barrows, with most examples being situated on, or just off the crests of hill, ridges and rises, being visible from large distances. Evidence from archaeological excavation of other barrows indicates that this visibility would often have been enhanced by keeping the barrows stripped of cover so as to stand out from their surroundings.

6.2.3. The deliberate location of barrows created connections and established relationships between individual barrows and other round barrows as well as connecting significant places in the landscape both near and far.

“It was the relationships between the barrows and in turn their relationships with their landscape settings that empowered people to identify with the landscape as a whole rather than just to specific places (individual barrow

locations) within it.” *Interpreting Landscapes: Geologies, Topographies, Identities: Explorations in Landscape Phenomenology 3* (C Tilley 2010).

6.2.4. In terms described in *Conservation Principles* (English Heritage 2008), barrows derive ‘evidential’ significance from their physical remains and the potential they have to inform us of their construction, use and social and religious beliefs. They also derive significance from their illustrative ‘historical’ value, the power to aid interpretation of the past through making connections with, and providing insights into, past communities and their activities through shared experience of place. In the case of barrows their prominent locations and commanding outlooks provide an instant visual understanding of the importance of place to the monuments’ location. Barrows also derive significance from their ‘aesthetic’ value, both of form and situation. In the case of barrows their conscious placement in their landscape is central to their significance and again assists in the understanding of the importance of place to former communities.

6.2.5. Warren’s Barrow and the round barrow cemetery 420m north east of Higher Ennis Farm also derive significance through their ‘associative’ historical value respectively as the supposed burial place of a certain General Warren, and through the preservation of the memory of the former Killigrew Estate, through the naming of Killigrew Barrow in the north of the cemetery.

HBMCE’s assessment of impact on the asset.

6.2.6. The cumulative impact on the barrow cemetery as a whole, including the two bowl barrows 290m and 375m north of Higher Ennis Farm; the round barrow cemetery 420m north east of Higher Ennis Farm; and Warrens Barrow has the potential to result in harm. The provision of further information in the form of a requested additional visualisation would provide greater clarification on the degree of impact. The importance of Warren’s Barrow as the best surviving element of the cemetery must be considered in any assessment of the wider barrow cemetery. The loss of spatial references arising from the removal of its primary outlook, as the result of the relocated A30 main carriageway passing adjacent to the barrow on an elevated section, has the potential to result in harm to the significance of the monuments.

- 6.2.7 The location of round barrows, whether individual or as part of a group, contributes greatly to their significance and the ability to 'read' their relationship with their setting is especially vulnerable to visual intrusions, this is greatly increased where that intrusion includes noise, movement, or odour.
- 6.2.8 Distant views are an essential factor in the location of barrows such that the loss of such visibility will result in loss of significance derived from this aspect of the barrow's setting. Barrows were intentionally located to both integrate into and, to confirm the, often significant ritual and social landscapes which they defined. A significant factor in their location was the ability to see and be seen. Barrows often have commanding views across specific landscapes, in this case Newlyn Downs, and these views were central to their importance. This loss of significance must be appropriately appreciated and should not be underestimated.
- 6.2.9. The rerouting of the line of the A30 will allow the previously separated elements of the wider barrow cemetery to be reconnected, allowing the cemetery to be experienced without the disconnection of the major barrow of the group by the existing A30.

6.3. The scheduled monument Warren's Barrow (SM 29681; NHLE 1016888).

- 6.3.1. HBMCE's main concern relating to impacts of the Scheme upon designated heritage assets is regarding the loss of experience of the setting and loss of visibility of the surrounding landscape in views to and from the scheduled monument, Warren's Barrow (SM 29681; NHLE 1016888). This is the result of the relocated A30 main carriageway passing adjacent to the barrow on an elevated section.

The significance of the asset.

- 6.3.2. The scheduled monument Warren's Barrow is a bell barrow, the most visually impressive form of round barrow, and is a funerary monument dating to the Early and Middle Bronze Age, belonging to the period 1500-1100 BC. Bell barrows occur either in isolation or, as at Carland Cross, in round barrow cemeteries and were constructed as single or multiple mounds covering

burials, often in pits, and surrounded by an enclosure ditch. The burials are frequently accompanied by weapons, personal ornaments and pottery and appear to be those of aristocratic individuals, usually men.

6.3.3. Warren's Barrow is situated on the tip of a south facing hill slope at the eastern edge of Newlyn Downs. It represents the most northerly of a group of barrows at Carland Cross which together formed a round barrow cemetery. The rest of the barrows in this group are the subject of separate designations (see 6.4; 6.5; 6.6; and 6.7). The barrow has a stepped appearance, surrounded on all sides by a lower and flatter berm. The total diameter of the barrow mound is 36m and it has a maximum height of 3.6m. Other barrows in the vicinity are known to have been accompanied by a surrounding ditch from which material was quarried for their construction. Whilst Warren's Barrow has no such visible surrounding feature at ground level, its approximately 2m wide ditch is likely to survive below ground, the infilling of the ditch by natural processes over the course of many centuries masking it from present view. The unusual shape of the barrow is consistent with the bell barrow form. The monument has become known locally as Warren's Barrow after a certain General Warren who was reputedly buried there.

6.3.4. Bell barrows are one of the rarest forms of barrow nationally, particularly outside Wessex where most survive. Their richness in terms of grave goods provides evidence for chronological and cultural links amongst early prehistoric communities over most of southern and eastern England as well as providing an insight into their beliefs and social organisation. Warren's Barrow survives well and will retain archaeological evidence relating to the monument and the landscape in which it was built. Together with a group of bell and bowl barrows to its south, Warren's Barrow forms part of a small round barrow cemetery and will retain archaeological and environmental evidence relating to the monument and the landscape in which it was built.

6.3.5. The bell barrow known as Warren's barrow derives great significance from its prominent position overlooking Newlyn Downs. As the primary barrow in the group this contributes greatly to its significance.

HBMCE's Assessment of Impact on the asset.

- 6.3.6. The scheme will result in Warren's Barrow being bounded to the north by an embankment carrying the new slip road accessing the new main carriageway of the A30. This embankment extends to the west until it transitions into a cutting.
- 6.3.7. This proposed embankment will result in the total loss of views out from, or to, the north east over Newlyn Downs. As the major barrow in the Carland Cross group this view is significant, not just to Warren's Barrow but to the cemetery as a whole.
- 6.3.8. The loss of views from, and to, Warren's Barrow across Newlyn Downs will lessen the ability to experience the asset in its setting and understand the reason for its location.
- 6.3.9. HBMCE considers the level of harm to Warren's Barrow to be at a high level of less than substantial. We would also note that the loss of views from Warren's Barrow will raise the level of harm to the round barrow cemetery 420m north east of Higher Ennis Farm as discussed below.
- 6.3.10. The removal of the existing A30 at this location will allow reconnection of Warren's Barrow with the wider barrow cemetery of which it is a major element. This reconnection combined with the improved public access and potential for on-site interpretation and a dedicated viewing area that have been recommended by HBMCE may be considered to provide a worthwhile environmental benefit.
- 6.4. The scheduled monument round barrow cemetery 420m north east of Higher Ennis Farm(SM 32903; NHLE 1020758).**
- 6.4.1. The scheduled Monument Round barrow cemetery 420m north east of Higher Ennis Farm (SM 32903; NHLE 1020758), is located just outside the red line boundary. However, the elevated section of the re-routed main carriageway of the A30 will impact upon the contribution made to the significance of this monument by its setting. The monument will benefit from the removal of the existing A30 and re-connection with Warrens Barrow

scheduled barrow to the north of the existing A30. The reconnection of these two elements of the wider barrow cemetery will allow the monument to be experienced without the disconnection of the major barrow of the group by the existing A30.

The significance of the asset.

- 6.4.2. The scheduled monument 420m north east of Higher Ennis Farm is a round barrow cemetery dating to the Bronze Age (c.2000-700 BC). Round barrow cemeteries comprise closely-spaced groups of up to 30 round barrows - rubble or earthen mounds covering single or multiple burials. Most developed over a considerable period of time, often many centuries, and in some cases acted as a focus for burials as late as the early medieval period. They exhibit considerable diversity of burial rite, plan and form, frequently including several different types of round barrow, occasionally associated with earlier long barrows.
- 6.4.3. The barrow cemetery 420m north east of Higher Ennis Farm survives well, the barrows showing clearly their differing forms. The mounds remain substantially intact and some have remains of a stone kerb and/or a ditch around them. The old land surface beneath the mounds and original buried deposits associated with them will also survive.
- 6.4.4. The monument includes a round barrow cemetery containing five barrows of bowl, bell and platform type, situated on the ESE shoulder of a ridge south west of Carland Cross. They are closely associated with four other barrows, which form outliers to the cemetery and are the subject of separate scheduling's. The five barrows are fairly closely and evenly spaced, with three aligned across the gentle slope of the land and are contained in four separate areas of protection. The two barrows on the south side of the group are aligned north west-south east. To the north, the scheduling includes a prominent bell barrow, known as Killigrew Barrow after the estate on which it lay. Quartz blocks around its base are considered to be part of a kerb of stones set in the perimeter of the mound. The western barrow in the scheduling is aligned with the southern pair and was described as probably a broad or platform barrow in 1898.

- 6.4.5. The barrow cemetery 420m north east of Higher Ennis Farm enjoys prominent views to the north and east across Newlyn Downs and would have been highly prominent in its landscape.
- 6.4.6. Occupying a prominent location, the barrows are a major historic element in the modern landscape, the diversity of form exhibited in the cemetery demonstrates the variety of beliefs and social organisation amongst early prehistoric communities. They are particularly representative of their period and the ridge-top location of the cemetery and the alignment of three of the barrows within it, together with the varying forms of the barrows in this scheduling and the other closely associated barrows beyond it, illustrate well the important role of topography and the diversity of practices within Bronze Age funerary activity.
- 6.4.7. Their location is highly significant for these barrows, with the cemetery being situated on and just off the crest of the ridge upon which the existing historic A30 route follows, being visible from large distances. Evidence from archaeological excavation of other barrows indicates that this visibility would often have been enhanced by keeping the barrows stripped of cover so as to stand out from their surroundings. The barrow cemetery 420m north east of Higher Ennis Farm enjoys prominent views to the north and east across Newlyn Downs and would have been highly prominent in its landscape.

HBMCE's Assessment of Impact on the asset.

- 6.4.8. The scheme will provide benefits to the significance of the monument through the removal of the existing A30 allowing Warren's Barrow to be experienced again as part of the barrow cemetery of which it is a major element. However, the engineering solution being proposed will result in an, as yet, unspecified degree of loss of the commanding views across Newlyn Downs to the north east. Once final engineering levels are agreed and an additional photomontage supplied it will be possible to determine where the cutting transitions to an embankment and thus the level of harm.
- 6.4.9. HBMCE awaits submission of a photomontage demonstrating the visual impact during construction and operation of the Scheme which is needed to

assess the nature and extent of this impact on the significance of the scheduled monument. In HBMCE's view it is not yet possible to provide a final assessment of the combined effects of the impact of the Scheme since there is outstanding information required to complete that assessment as detailed above.

6.4.10. The cumulative impact on the barrow cemetery as a whole, including the two bowl barrows 290m and 375m north of Higher Ennis Farm; the round barrow cemetery 420m north east of Higher Ennis Farm; and Warrens Barrow has the potential to result in harm. The provision of further information to assist in the understanding is necessary to understand the degree of impact or harm on the significance of the designated heritage assets. The importance of Warren's Barrow as the best surviving element of the cemetery must be considered in any assessment of the wider barrow cemetery.

6.5. The Scheduled Monument Two bowl barrows 290m and 375m north of Higher Ennis Farm (SM 32902; NHLE 1017050).

6.5.1. There will be impacts to the contribution made by its setting to the significance of the northernmost barrow of the scheduled monument two bowl barrows 290m and 375m north of Higher Ennis Farm (SM 32902; NHLE 1017050). The close proximity of the re-positioned A30 main carriageway at this point will result in the barrow being bounded to the north by a 15 degree retaining slope to the carriageway below. HBMCE has recommended a programme of works intended to provide a degree of environmental benefit to the significance of this and the other scheduled barrows at Carland Cross.

The significance of the asset.

6.5.2. Despite their separate designation the two bowl barrows 290m and 375m north of Higher Ennis Farm should be considered as part of the extensive Carland Cross barrow cemetery.

6.5.3. The two barrows themselves are bowl barrows, funerary monuments dating from the Late Neolithic period to the Late Bronze Age, with most examples belonging to the period 2400-1500 BC. They were constructed as

earthen or rubble mounds, sometimes ditched, which covered single or multiple burials. They occur either in isolation or, as at the Four Burrows and the Carland Cross barrows, grouped as cemeteries, often acting as a focus for burials in later periods. They are particularly representative of their period and will retain many of their original features providing information about these monument and the landscape in which they were built.

6.5.4. The two barrows ridge-top location close to a cemetery containing different barrow forms illustrates well the important role of topography and the diversity of practices within Bronze Age funerary activity.

HBMCE's Assessment of Impact on the asset.

6.5.5. The impact considered here is focused on the northernmost barrow of the scheduling as in closest proximity to the A30.

6.5.6. The monument sits, at present in a scrubbed up area adjacent to the existing A30. The Scheme will see the existing A30 re-routed to the north and the new main carriageway occupying the former A30. This new carriageway will be in a cutting and will necessitate a soil nailed 15 degree stabilisation slope coming to within five metres of the monument.

6.5.7. The Scheme will result in the outlook from this barrow being a view immediately across the new carriageway of the A30 in a cutting immediately below the barrow. Although there will be a greater visual impact than the current A30, which is also adjacent, the lower level will help to offset the increased width and HBMCE consider the harm to the significance of this barrow from the new Scheme to be towards the middle of the less than substantial range.

6.5.8. As part of the SoCG discussions between HBMCE and Highways England the potential for environmental gain for the whole of the Carland Cross barrow cemetery affected by the loss of spatial references arising from the removal of its primary outlook is being considered. This consideration encompasses the provision of viewpoints, access, and interpretation. We have recommended that a viewpoint be established at the northernmost barrow, which will allow visitors accessing the cemetery via the new

access afforded by the removal of the existing A30 to look out over Newlyn Downs and appreciate the outlook that was so important in their placement. This access point should include on-site interpretation as part of a wider interpretation strategy incorporating the wider barrow cemetery and supported by publication of the results of investigations undertaken as part of the scheme incorporating historical research to tell the story of this historic route.

6.6. The scheduled monument bowl barrow 500m north west of Higher Ennis Farm (SM 32901; NHLE 1017049).

6.6.1. The scheduled monument bowl barrow 500m north west of Higher Ennis Farm (SM 32901; NHLE 1017049), abuts the northern edge of the existing A30. It is proposed that the new carriageway pass to the south of this. HBMCE concurs with the findings of the ES and consider the level of harm to be in the low to middle on the less than substantial range.

6.7. Prehistoric long barrow and four round barrows 580m and 750m south west of Mitchell Farm (SM 32907; NHLE 1017350).

6.7.1. During the construction phase it is proposed that the eastern compound will surround the westernmost area of the scheduling, including a long barrow and a round barrow.

The significance of the asset.

6.7.2. Long barrows are earthen or dry stone mounds with flanking ditches of the Early and Middle Neolithic periods (3400-2400 BC). As the communal burial places of Britain's early farming communities, they are amongst the oldest field monuments surviving visibly in the present landscape. There may be several phases of funerary monument preceding the barrows, which were probably important ritual sites for local communities over a long period of time. Long barrows are comparatively rare and are of considerable age, being one of the few types of surviving Neolithic earthworks.

6.7.3. Round barrows date mostly to the Late Neolithic and Early Bronze Age (c.2400-1500 BC). They are earthen mounds, sometimes ditched, covering

single or multiple burials. They occur either in isolation or, as here, grouped in cemeteries. They often acted as a focus of burials in later periods, and are occasionally associated with earlier long barrows.

6.7.4. Both long barrows and round barrows are long lived monument types and often occupy prominent positions in the landscape. Despite being reduced by ploughing, the low mounds with discernible plans remain, as will the underlying old land surface and any surviving original deposits in the base of the mounds. The location of the round barrows in a wider ridge top cemetery, the close association of the long barrow with the later round barrows, and the alignment of the round barrows, illustrate well the important roles of topography and of continuity in prehistoric funerary activity.

HBMCE's Assessment of Impact on the asset.

6.7.5. The western scheduled area of this monument will be enveloped within the proposed eastern works compound. HBMCE are concerned that the Construction Environmental Management Plan (CEMP) does not include a specific strategy for the demarcation and protection of scheduled monuments affected by or adjacent to the Scheme (see CEMP comments at 7.10.6.).

6.7.6. HBMCE consider the preparation and implementation of a Scheduled Monuments Construction Management Plan (SMCMP), to be an essential requirement for the preservation of scheduled monuments and the avoidance of otherwise avoidable accidental damage. The management plan should be produced in consultation with HBMCE before it is submitted for approval.

6.7.7. Without provision for the production and implementation of an agreed SMCMP, HBMCE are unable to comment on the impact on significance of the monument of the use of this area for a works compound. It is important that this document provides for the acceptable removal and reinstatement of the land surrounding the works compound at Scheme completion and that this is secured in the DCO.

6.8. The Four Burrows scheduled monument (SM 29602; NHLE 1016064).

6.8.1. The scheduled monument the Four Burrows (SM 29602; NHLE 1016064), lies in proximity to the Red Line Boundary. HBMCE is concerned to ensure

that the impact of the Scheme on the contribution made by its setting to the significance of this monument is fully considered and appropriately addressed.

6.8.2. The scheduled monument known as the Four Burrows straddles the existing A30, with one barrow to the north and three barrows to the south, the southern barrows being further divided by a farm access track with one barrow to the west in the corner of a field which also houses a solar farm and the remaining two to the east of the track.

The significance of the asset.

6.8.3. The Four Burrows themselves are bowl barrows, funerary monuments dating from the Late Neolithic period to the Late Bronze Age, with most examples belonging to the period 2400-1500 BC. The Bronze Age date of the group is confirmed by the discovery in one of the barrows of a megalithic chambered structure containing an inurned cremation. They were constructed as earthen or rubble mounds, sometimes ditched, which covered single or multiple burials. They occur either in isolation or, as at the Four Burrows and the Carland Cross barrows, grouped as cemeteries, often acting as a focus for burials in later periods. They are particularly representative of their period and will retain many of their original features providing information about the monument and the landscape in which it was built.

6.8.4. The monument is situated on a commanding hilltop at Four Burrows, about 350m north west of Fourburrow Farm and are a local landmark for those travelling east on the A30, becoming visible as one progresses from Chiverton Cross. The barrows straddle the parish boundary between Kenwyn and Perranzabuloe with two barrows lying either side of the boundary.

6.8.5. The four barrows vary between 16m and 24m in diameter, and between 2.5m and 3.9m high. Two of the mounds have central circular depressions which indicate antiquarian excavation. The barrows may represent the surviving core of a nucleated round barrow cemetery.

6.8.6. The significance of this monument is reflected in its group designation and reflects the likelihood that these barrows are the surviving remnants of a more extensive barrow cemetery.

HBMCE's Assessment of Impact on the asset.

6.8.7. The proposed route of the new A30 passes approximately 75m to the north of the northernmost scheduled barrow. Although the route passes this point in a cutting, the elevated position and height of the scheduled barrows is such that it is likely that the road will be visible in views to and from the monument. Although the existing A30 passes between this barrow group the Scheme will introduce a further modern element into the setting of the monument.

6.8.8. All four barrows within this scheduling are of similar height and elevation and it is HBMCE's position that any impact on the northernmost barrow will have a similar effect on those south of the existing A30.

6.8.9. HBMCE consider that the Scheme will introduce a new element into the setting of the barrows with an unavoidable impact on the significance of the monument in the form of a new linear feature passing to the north with the attendant increase in noise levels. However, we also recognise that the de-trunking of the existing A30 will greatly reduce the impact of the current A30 route through the reduction of traffic volume and lessening of noise and fumes, particularly at peak times when traffic is currently often stationary at this point. HBMCE are in discussion with Highways England regarding potential positive works in the form of a narrowing of the existing carriageway and provision of parking to allow safer access to the monument at the Four Burrows.

6.8.10. HBMCE considers that any assessment of impact must consider the scheduled monument as a whole and that the likely overall impact of the scheme on the scheduled monument will result in a level of harm towards the middle of the range that is less than substantial harm.

6.9. The scheduled monument bowl barrow 100m south west of Callestick Vean (SM 29618; NHLE 1016103).

6.9.1. The new carriageway will pass between the scheduled monument bowl barrow 100m south west of Callestick Vean (SM 29618; NHLE 1016103), and the existing A30. HBMCE generally concurs with the findings of the ES and considers the proposals will result in a level of harm in the upper reaches of the less than substantial range.

6.10. The scheduled monument hill fort 250m south west of Tresawsen (SM 29671; NHLE 1016445).

6.10.1. The scheduled monument hill fort 250m south west of Tresawsen (SM 29671; NHLE 1016445), lies to the north of the existing A30. The proposed new carriageway runs to the south of the existing A30. HBMCE concurs with the findings of the ES and considers the level of harm to be low in the scale of less than substantial.

6.11. The scheduled monument bowl barrow 130m south east of Penglaze (SM 29680; NHLE 1016887).

6.11.1. The new carriageway passes to the south of the existing A30, which also passes to the south of the scheduled monument bowl barrow 130m south east of Penglaze (SM 29680; NHLE 1016887). HBMCE concurs with the findings of the ES and considers the level of harm to be low in the scale of less than substantial.

6.12. The Three Burrows scheduled monument (SM 29604; NHLE 1016056).

6.12.1. The new junction and slip roads at Chiverton will pass to the north of the scheduled monument The Three Burrows. HBMCE concurs with the findings of the ES and considers the level of harm to low in the scale of less than substantial.

6.13. Cornwall and West Devon Mining Landscape World Heritage Site (NHLE 1000105).

6.13.1. Much of the landscape of Cornwall and West Devon was transformed in the 18th and early 19th centuries as a result of the rapid growth of pioneering copper and tin mining. Its deep underground mines, engine houses, foundries, new towns, smallholdings, ports and harbours, and their ancillary

industries together reflect prolific innovation which, in the early 19th century, enabled the region to produce two-thirds of the world's supply of copper. The substantial remains are a testimony to the contribution Cornwall and West Devon made to the Industrial Revolution in the rest of Britain and to the fundamental influence the area had on the mining world at large. Cornish technology embodied in engines, engine houses and mining equipment was exported around the world. Cornwall and West Devon were the heartland from which mining technology rapidly spread.

6.13.2. An area of the World Heritage Site (WHS) is situated south west of the existing Chiverton Cross A30 junction. HBMCE does not consider that the Scheme will result in any significant impacts upon the Outstanding Universal Value (OUV), of the WHS and will not comment further in this document.

6.14. Two individually listed Grade II Milestones (NHLE 1140923) and (NHLE 1394843).

6.14.1. Two grade II listed Milestones (NHLE Nos. 1140923 and 1394843), located at NGR SW771486 and SW845539 on the A30 within the Development Consent Order (DCO) boundary, will be directly impacted. These listed milestones are the subject of Annex J of the CEMP.

6.14.2. The first of these two Grade II Listed milestones (NHLE 1140923) is believed to have been moved at some point in its history because it is not in sequence with mileage on the next stone to the east. This stone formed part of the original turnpike scheme from the 18th century and has a recut inscription indicating re-use. The milestone provides valuable evidence of transport development on this major route.

6.14.3. The second of the two Grade II Listed milestones (NHLE 1394843), also dates from the 18th century, however, the inscriptions were altered in the late 19th century. Unusually, it was placed on a section of road that was never turnpiked and provides important evidence for the County Council's adoption of such roads in the late 19th century. The milestone, with others on the route, as a group provides valuable evidence of transport development on this major route.

HBMCE's Assessment of Impact on the assets.

6.14.4. The Scheme will result in the removal of both milestones and re-instatement at appropriate locations on the de-trunked A30. HBMCE considers the impact on both of these milestones to be less than substantial.

6.14.5. In considering the impact on these milestones HBMCE has noted the arrangements outlined in Volume 6 Document Ref 6.4 ES Appendix 16.1 – Outline CEMP Annex J: Methodology for the Milestone Protection Management Plan.

6.15. The Grade II Listed Building: Church of St Peter at Chiverton, Grade II (NHLE no. 1141481).

6.15.1. The Grade II Listed (LB), Church of St Peter (NHLE 1141481), was built in 1847 of Killas rubble with granite and freestone dressings. The tower was rebuilt in 1898 and is a landmark in the historic landscape in which the A30 sits. Despite its relatively level situation and later encroachment around the church, the church tower is still a prominent feature and adds to the architectural and aesthetic significance of the building. Its prominence is illustrative of the long tradition of church towers as the most prominent features in the landscape and its importance as a landmark for travellers.

6.15.2 Although the Church of St Peter is Grade II Listed (NHLE no. 1141481), in this instance HBMCE have maintained concerns that the photomontage supplied (VP4), Burrows. This photomontage will be required in order to allow an informed assessment to be made of the impact the proposed new junction at Chiverton on this important historic landscape feature.

6.16. The Grade I Listed Building at Trerice (NHLE 1328731).

6.16.1. Although it sits outside the 300m Scheme study area, HBMCE have requested assessment of this Grade I house in order to confirm that the proposals will not impact upon its significance.

7. ENVIRONMENTAL STATEMENT

7.1. HBMCE has reviewed the Environmental Statement (ES), primarily focusing on *Chapters 6 Cultural Heritage* and *Chapter 7 Landscape* and their associated appendices.

7.2. Chapter 6 Cultural Heritage

7.2.1. Four Burrows scheduled monument

7.2.2. Paragraph 6.11.23. Although views to the west and south from the westernmost barrow, south of the A30 do include an extensive solar farm, it should be noted that this is a static feature that is experienced in, but does not impede upon, those views. Although the solar farm is evident in these views it does not impede views out from the barrows over their setting or views across the solar array to the barrows

7.2.3. HBMCE concurs with the assessment of impact presented for the northern barrow; however, we consider that this significance of effect applies to the monument as a whole. Whilst the view to the north from the southern barrows does include the existing A30, because of location, topography and scale, those views are otherwise the same as those from the northern barrow and any significance of effect should reflect this.

7.2.4. HBMCE considers that the significance of this barrow group must be considered as a whole, as part of a former barrow cemetery and that any assessment of impact on the scheduled monument must include the scheduled area as a whole.

7.3. Two bowl barrows 290m and 375m north of Higher Ennis Farm.

7.3.1. HBMCE concurs with the proposed significance of effect for both the operational (6.11.59), and construction (6.11.60 temporary), phases.

7.4. Round barrow cemetery 420m north east of Higher Ennis Farm

7.4.1. HBMCE awaits further visualisations in order to consider a fully informed understanding of the significance of effect for the operational phase of the Scheme (6.11.63). It is not as yet clear how much the views to the north will be truncated by the western extent of the embanked slip road.

7.4.2. HBMCE is pleased to note the comments regarding demarcation and protection during construction at 6.11.64; however, we are unable to locate any method statement for the protection of scheduled monuments during construction in the CEMP.

7.5. Warren's Barrow

7.5.1. Regarding the loss of views to the north and west over Newlyn Downs, HBMCE considers the assessment of significance of effect at 6.11.72 does not adequately reflect the importance of these views. Consequently we consider that despite the benefits arising from the removal of the existing A30, which does not lessen the Large Adverse significance of effect.

7.5.2. The importance of location to the significance of barrows has been mentioned previously in our response, it is, however, important to understand the critical importance of visibility to the deliberate location of barrows. The complete obstruction of these views will largely divorce the barrow from its wider setting and reason for location.

7.5.3. HBMCE concurs with the assessment of significance of effect for the construction phase (6.11.73 temporary), and would repeat our comments regarding the need for a method statement covering the protection of scheduled monuments during construction to be included in the CEMP.

7.6. Prehistoric long barrow and four round barrows 580m and 750m south west of Mitchell Farm.

7.6.1. HBMCE concurs with the assessment of significance of effect for the construction phase (6.11.77 temporary), and would repeat our comments regarding the need for a method statement covering the protection of scheduled monuments during construction to be included in the CEMP.

7.7. Chapter 7 Landscape

- 7.7.1. The Environmental Masterplans illustrate the proposed planting schemes for mitigation and enhancement. Whilst 7.10.29 refers specifically to Planning Policy Features, including scheduled monuments, all planting proposals have the potential, through inappropriate planting, to impact upon the significance of those monuments.
- 7.7.2. The Environmental Masterplans 4 and 18 illustrate the landscaping at Four Burrows and Carland Cross respectively, confirming that the planting regimes are not in conflict with the requirements of the significance of the scheduled monuments.
- 7.7.3. At 7.11.44 the effects on heritage receptors are considered. The year one effects on scheduled barrows at Callestick Vean (1016105), and (1016103), are considered to be moderate and large adverse respectively, reducing to slight and moderate by year 15, however, this would be achieved by deciduous planting partially obscuring the view. It is important to ensure that any such screening planting does not in itself result in further adverse effects on the significance of heritage assets.
- 7.7.4. The impacts on the barrow cemetery as a whole at Carland Cross is assessed as large adverse in year one, with no noticeable decrease by year 15. The requirement for low height planting in keeping with the landscape character is noted. Whilst planting will help to soften the visual impact of the construction works here, we welcome the acceptance that any tall species will be inappropriate at this location because of increased impacts on the significance of the barrow cemetery.

7.8. Table 7-13

- 7.8.1. VP 4 view across the landscape, within which the tower of Grade II Listed St Peter's Church and the nearby Four Burrows barrow cemetery. This entry is supported by Viewpoint four of Figure 7-5 of *Volume 6 Document Ref: 6.3: Photosheets*. We would note that the photograph looks west across farmland rather than south west towards St Peter's church.

7.8.2. This document does not include any visualisations from the round barrow cemetery at Carland Cross generally or from Warren's Barrow in particular despite previous requests. These are essential to understanding the actual visual impact of the Scheme and allowing for an informed assessment of harm to be made.

7.9. 7.3 Mitigation Route Map.

7.9.1. Table 2-1 Mitigation Route Map

7.9.2. HBMC supports the requirement at CH2 to produce and implement a Written Specification of Archaeological Investigation (WSI), for the scheme in areas of archaeological interest; however, we would suggest that this covers archaeological monitoring of all excavation works as determined by the archaeological contractor who should be present during all relevant groundworks. An appropriate and proportionate response to the potential for archaeological remains should be identified as part of the WSI under the CEMP to be executed by a recognised professional and appropriately experienced archaeological team.

7.9.3. HBMCE recommends that the WSI include a strategy for the investigation and implementation of environmental sampling and processing.

7.9.4. HBMCE supports the requirement that the WSI be prepared in consultation with HBMCE, the local authority's specialist archaeological and conservation advisors, the relevant planning authority and the local highway authority, agreed with HBMCE and Cornwall Council and submitted and approved by the Secretary of State.

7.9.5. HBMCE supports the production of a Milestone Protection Management Plan as described in Annex J of the Outline CEMP.

7.9.6. The Mitigation Route Map contains no reference to the need for a Scheduled Monument Management Plan in order to ensure the monuments are adequately marked and protected during construction works. This should be a requirement of the CEMP.

7.9.7. HBMCE has identified the need for the identification of appropriate exclusion areas around the scheduled monuments adjacent to or affected by the construction works or temporary works compounds to be established under the CEMP to ensure their protection from physical construction effects. However, we are concerned that this does not appear to have been secured in the DCO which would mean that notwithstanding any area being identified, there is no apparent mechanism to ensure that exclusion areas would be provided and the timing for its provision. In addition the positioning, form and extent of any buffer zones are yet to be clarified and agreed.

7.10. CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

7.10.1. Training and site induction – 16.8.6. – This should include the location, extent, special provisions and, liabilities of all concerned regarding the scheduled monuments affected or adjacent to the Scheme.

7.10.2. Annex F: Outline Written Scheme of Investigation (WSI).

- (a) The WSI should be prepared by the applicant's chosen archaeological contractor and submitted for approval to the County Archaeologist and HBMCE.
- (b) The WSI should include a detailed environmental sampling, investigation, processing and reporting strategy.
- (c) The WSI should include provision for the removal of any human remains encountered in the course of the works.
- (d) The WSI should be adhered to in full, including post-excavation and specialist works and reporting.

7.10.3 Annex J: Methodology for the Outline Milestone Protection Management Plan.

The outline MPMP should be agreed with the relevant Conservation Officer.

7.10.4. Annex M: Public Rights of Way Management Plan.

HBMCE requires clarification of access rights to be created at the Carland Cross barrow cemetery.

- 7.10.5. Annex N: Outline method statement for the translocation of heathland. There should be no excavation, cultivation or scarification of the land in which the Carland Cross barrow cemetery is located for the purposes of heathland creation.
- 7.10.6. There are currently no procedures in place to secure the demarcation and protection of affected and adjacent scheduled monuments during the construction phase.
HBMCE considers the preparation and implementation of a scheduled monuments construction management plan (SMCMP), to be an essential requirement for the preservation of the monuments and the avoidance of accidental damage. The management plan should be produced in consultation with and the approval of HBMCE.
- 7.10.7. Despite consultation neither the ES, CEMP, nor DCO appear to contain provision for the production, implementation and publication of an integrated interpretation strategy.
HBMCE considers the production of an integrated interpretation strategy to be an essential outcome of the Scheme if it is to be considered as a mitigating factor in their landscape. This strategy should incorporate on-site interpretation.

8. DEVELOPMENT CONSENT ORDER (DCO)

- 8.1. The purpose of HBMCE's comments on the DCO is to ensure that if appropriate mitigation measures are required to address any issues, that these are set out in the DCO and their provision is then undertaken and maintained to ensure that the protection and conservation of the designated heritage assets is delivered. This is important not only during detailed design of the Scheme, but during its construction implementation and operation of the Scheme. This includes the production of and referral to appropriate management documents and an archaeological and historic environment mitigation strategy for any designated and non-designated assets that may be affected. The points raised below are issues that we consider need to be dealt with in the terms of the DCO.

8.2. The following comments cover articles under Part 1-7, and Schedules 1 to 10:

Part 2, Limits of Deviation

8.2.1. HBMCE would welcome confirmation from the Applicant that the limit of lateral deviation included on the Works Plans (Sheet 3, 6, 7, and 8) will not entail encroachment within the scheduled monuments; two bowl barrows 290m and 375m north of Higher Ennis Farm; round barrow cemetery 420m north east of Higher Ennis Farm; and Warren's Barrow. The WSI to be included under the CEMP as part of the DCO should be designed to cover the area included within the full limit of deviation, both lateral and vertical.

8.2.2. HBMCE is concerned that the 0.5m vertical limit of deviation at Carland Cross may limit any alternative engineering options that would reduce the impact on Warren's Barrow scheduled monument through reduction of levels. In order to reduce the obstruction of views and subsequent impact upon Warren's Barrow and the round barrow cemetery scheduled monuments it would be necessary to reduce the levels of the slip road and carriageway. We are informed that in order for this to be over 500mm. The Scheme start point east of Carland Cross may need to move further east in order to accommodate this.

Part 4, Supplemental Powers:

8.2.3. *20. Discharge of water* - Any proposed works associated with the laying down, taking up or alteration of pipes for the drainage of water should have regard to the archaeological potential of the area and if necessary be subject to the requirements of the WSI included in the CEMP based on the advice of the local planning authority's archaeological adviser. The provisions as currently drafted do not appear to ensure that this will be secured.

8.2.4. *21. Protective works to buildings* – The special architectural and historic interest of any listed building affected should be appropriately protected from collateral damage during construction of the Scheme. The special architectural and historic interest of any listed building affected should be a primary consideration with any works. The local planning authority and HBMCE should be consulted on any works affecting a Grade I or Grade II*

listed building, and the local planning authority should be consulted on any works affecting a Grade II listed building.

- 8.2.5. *22.1.c Authority to survey and investigate land* - HBMCE would expect the Applicant to agree in advance the extent, scope and methodology of any archaeological survey or investigation conducted with the local planning authority and (where a scheduled monument is involved) HBMCE under the WSI to be included under the CEMP. This should be completed sufficiently in advance of the commencement of construction for the results to be analysed to inform an appropriate and proportionate mitigation strategy for that same part of the Scheme.
- 8.2.6. *27 (3)(c) Public Rights of Way* – HBMCE would expect the applicant to agree in advance the extent of new public rights of access to the scheduled monuments that form the Carland Cross barrow cemetery.

Schedule 1 – Authorised Development.

- 8.3. Works 12 to 74 Diversion of drainage, power and other utilities.
Any potential for works to affect non-designated archaeological remains should be appropriately addressed under the WSI to be included under the CEMP.

Schedule 2 – Part 1, Requirements:

- 8.3.1. *Construction Environmental Management Plan, CEMP (3)* – HBMCE has reviewed and provided comments on the draft Outline Environmental Management Plan (OEMP), above.
- 8.3.2. All archaeological investigation conducted under the WSI not yet completed to date should be completed sufficiently in advance of the commencement of construction for the results to be analysed and inform an appropriate and proportionate mitigation strategy for that same part of the Scheme.
- 8.3.3. Given the potential for archaeological remains to be uncovered which are directly associated with the nationally important archaeological remains of any scheduled monument affected by the Scheme, HBMCE would wish to be consulted on the scope, extent and methodology for archaeological work in the relevant parts of the Scheme under the WSI.

- 8.3.4. The WSI should include for the removal of human remains – Consent will need to be obtained from the Secretary of State for Justice to remove human remains. HMBCE would expect the treatment of human remains to be addressed under the WSI to be included under the CEMP.
- 8.3.5. It is essential that the Scheme confirms that provision is made for adequate post excavation and analysis works and for subsequent reporting and publication including and publication of information about the historic A30 route and the investigation undertaken historically and as part of this Scheme in a popular, accessible format.

9. SUMMARY AND CONCLUSION

- 9.1. In conclusion and to summarise our written representation, HMBCE considers that there remain to be addressed important issues requiring action and clarification by the Applicant. These are detailed in our written representations. HMBCE understands through discussions with the Applicant that some of these issues are in hand. These, together with the other issues highlighted, are matters which HMBCE considers are important to enable the extent of impact of the Scheme on the significance of the designated heritage assets to be fully taken into account by the Examining Authority in its final assessment of the Scheme.
- 9.2. HMBCE considers the following to be the main issues arising from the scheme;
- (a) The Scheme will result in varying levels of less than substantial harm to a number of designated heritage assets including ten scheduled monuments.
 - (b) The scheme will result in a high level of harm to the Carland Cross barrow group, which includes at least five scheduled monuments. This applies especially to Warren's Barrow which will lose an element of its significance and to the scheduled round barrow cemetery upon which we await further visualisation, but which also has the potential for loss of significance.
 - (c) The potential for unintended damage to a number of scheduled monuments within or adjacent to the Scheme is high. The scheme does

not include adequate provision to provide for protection during construction works.

- 9.3. The scheme has the potential to provide a degree of some benefits through the provision of environmental improvements including the provision of access, the reconnection of Warren's Barrow with the wider barrow cemetery at Carland Cross, the provision of on-site interpretation, and the dissemination of information through publication.
- 9.4. Also important, with regards to the design proposals to mitigate the impact of the Scheme on the significance of the designated heritage assets, will be securing a long term management plan. HBMCE is therefore keen to gain a better understanding of long term management proposals, and that these will be properly secured within the DCO.
- 9.5. This section concludes the Written Representation of HBMCE.
- 9.6. HBMCE will continue to discuss those matters yet to be agreed as part of a positive, constructive dialogue with the Applicant, in the interests of identifying solutions to the range of outstanding issues identified in this Written Representation concerning the avoidance and minimisation of harm to the historic environment that arises under the Scheme.