



Members of the Panel of Examining Inspectors  
for M25 Junction 10/A3 Wisley interchange  
improvement project  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Our ref:  
PINs ref: TR010030  
  
Registration  
ID No.:

28 February 2020

Dear Panel of Examining Inspectors,

**Please find below the written submissions from Historic England for Deadline 5: 3 March 2020**

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Digital, Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

**Written submission – Examining Authority's first written questions and requests for information (ExQ2) - Issued on 18 February 2020**

**Question 2.7.4: Local Authorities and Historic England**

In Table 11.5 of Chapter 11 of the ES [APP-056] the Applicant finds that there would be a 'Slight Adverse' residual effect for seven designated heritage assets. At ISH2 the Applicant confirmed that in terms of paragraphs 5.131 to 5.134 of the National Policy Statement on National Networks 'Slight Adverse' would equate to these residual effects as giving rise to 'substantial' or 'less than substantial harm'. Please comment on this?



Historic England,  
Floor 4 The Atrium, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA  
Telephone: 020 7973 3700

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



**Historic England response:** Determination of what constitutes ‘harm’ in terms of the Infrastructure Planning (Environmental Impact Assessment) Regulations (2017) is assessed using different terminology to that of the National Policy Statement on National Networks. In EIA terms such as moderate, slight adverse or large adverse are used, which can be broadly be equated to the terms substantial or less than substantial harm used in the NPS. We agree that the residual effect is slight adverse in EIA terms for these seven designated heritage assets.

### **Question 2.7.5: Local Authorities, Historic England and Painshill Park Trust**

At ISH2 [EV-005a to EV-005d]the Applicant stated that the proposed access road for the gas compound, Heyswood camp site and Court Close Farm that runs through part of Painshill Park would not be in an area that contributes to the significance of the Park and therefore the proposed route would not affect its significance. Please comment on this.

**Historic England response:** The significance of Painshill Park lies primarily in the landscaped areas and structures found to the south and south-west concentrated around the lake and the Gothic Tower. The area to the north around Heyswood camp site and Court Close Farm lies along one edge of the park alongside the A3 road and, although it is within the Registered Park and Garden, it is of less significance than other parts. On historic maps it is depicted as woodland with a small path weaving through it. We think that creating an access road in this area would cause a low degree of harm to the landscape, as it would further alter its historic landscape character, which was previously slightly compromised by its proximity to the A3.

### **Question 2.7.7: Surrey County Council and Historic England**

Are you satisfied with the timescales for delivery of the Archaeology WSI and that this is adequately secured in R14 of the dDCO [REP2-002], and also that the specific details of this would only be required under R14 rather than having an Outline WSI provided in advance?

**Historic England response:** We are satisfied with the timescales for delivery of the Archaeology WSI and that this is adequately secured in Requirement 14 of the dDCO. We recommend that a Framework WSI should be provided by the undertaker that sets out the overall approach to the assessment and mitigation of archaeological remains in order to provide a scheme and sequence for commissioning the detailed WSIs in relation to each part of the scheme.



Historic England,  
Floor 4 The Atrium, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA  
Telephone: 020 7973 3700

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



Yours sincerely



Isabelle Ryan

Assistant Inspector of Historic Buildings and Areas

CC: Paul Roberts (Historic England- Team Leader - Development Advice)



Historic England,  
Floor 4 The Atrium, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA  
Telephone: 020 7973 3700

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.

