M25 junction 10/A3 Wisley interchange TR010030
8.4 Statement of Common Ground with Historic England

Rule 5(2)(q)
Planning Act 2008
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

Volume 8
May 2020

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended)

M25 junction 10/A3 Wisley interchange

The M25 junction 10/A3 Wisley interchange Development Consent Order 2020

8.4 STATEMENT OF COMMON GROUND WITH HISTORIC ENGLAND

Regulation Number:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	TR010030
Application Document Reference	TR010030/APP/8.4
Author:	M25 junction 10/A3 Wisley interchange project team, Highways England

Version	Date	Status of Version
Rev 3	1 May 2020	Deadline 8
Rev 2	3 March 2020	Deadline 5
Rev 1	28 January 2020	Deadline 3
Rev 0	June 2019	Development Consent Order application

STATEMENT OF COMMON GROUND

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

Signed

Jonathan Wade

Project Manager
on behalf of Highways England

Date: 27/04//2020

Signed

Paul Roberts

Team Leader - Development Advice (Kent, East and West Sussex and Surrey)
on behalf of Historic England

Date: 17/04/2020

Table of contents

Chapter Pages

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 M25 junction 10/A3 Wisley interchange improvement scheme ("the Application") made by Highways England Company Limited ("Highways England") to the Secretary of State ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").

1.1.2 The SoCG has been prepared in accordance with the guidance published by the Department of Communities and Local Government.[1]

1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.

1.1.4 The 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 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 The SoCG covers the final position as agreed with Historic England as at 1 May 2020 and supersedes that submitted at Deadline 5 [REP5-005]. Although the SoCG relates to the DCO examination period only, it is acknowledged that there will be a need for further agreement between the parties during detailed design and the execution of works.

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 England.

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, including in respect of the Application, to be conferred upon or assumed by Highways England.

1.3. The role of Historic England and the DCO application

1.3.1 The Historic Buildings and Monuments Commission for England was established with effect from 1 April 1984 under section 32 of the National Heritage Act 1983,

1 Department for Communities and Local Government Planning Act 2008: Guidance for the examination of applications for development consent.

and since 1 April 2015 has been known as Historic England (and before that as English Heritage). It is a non-departmental public body sponsored by the Department of Digital, Culture Media and Sport (DCMS) with responsibilities for the historic environment in England:

1.4. Terminology

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

1.4.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to Historic England, and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to Historic England.

2. Record of Engagement

2.1.1 A summary of the meetings and correspondence that has taken place between Highways England and Historic England in relation to the Application is outlined in table 2.1.

Table 2.1: Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
21.02.17	Meeting with Historic England	An introduction to the Scheme, with a presentation of the objectives and options. Historic England's concerns include the impact on historic monuments close to junction 10, in particular RHS Wisley Gardens.
08.03.17	Letter from Historic England	Response to the meeting of 21.02.17, providing local heritage information, highlighting key issues and concerns and responding to the current Scheme proposals.
10.04.17	Letter from Historic England	Further response to the meeting of 21.02.17 providing further heritage information, highlighting key issues and concerns and responding to the current Scheme proposals.
30.05.17	Meeting with Historic England and Painshill Park.	Discussions focussed on impacts at Painshill Park and included: • current stage options • impacts on the Gothic Tower • noise impacts and mitigation • impacts from construction
06.06.17	Meeting with Historic England and RHS Wisley	To discuss plans for WIS-01 and WIS-010 side road options for Wisley Lane and potential impacts on RHS Wisley. Discussions regarding south facing slip roads at the Ockham Park junction.
29.11.17	Email	The Preferred Route Announcement.
22.01.18	Meeting with Historic England	Stakeholder updates and heritage discussions.
23.03.18	Historic England Statutory Consultation response	Historic England provided feedback on the Scheme proposals. Feedback on the assessment of the construction and operational effects of the proposal upon heritage assets (n those listed grade I or II* or scheduled as ancient monuments). Key concerns regarding grading of listed buildings, consideration of setting and Painshill Park Gothic Tower.
17.10.18	Meeting with Historic England	Provided updates to the scheme and discussed the impacts on Painshill Park and mitigation measures.

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
14.12.18	Historic England Targeted Consultation response	Historic England provided feedback on the changes made to the Scheme since the Statutory Consultation earlier in the year.
18.12.18	Meeting with Historic England	An approach was agreed on the method for progressing the Statement of Common Ground.
08.04.19	Email	Draft Cultural Heritage Chapter of the Environmental Statement sent to Historic England for their review.
09.04/19	Email	SoCG sent to Historic England for their review.
17.04.19	Meeting with Historic England	Discussion and review of the draft DCO requirements, the draft Cultural Heritage chapter of the Environmental Statement (ES) and the Statement of Common Ground. Historic England confirmed that they have no major points of disagreement in relation to the ES chapter.
10.05.19	Email	Historic England provide feedback on the SoCG noting not they are fully agreed about the scheduled monuments of the Roman bath house and the Hengiform monument.
12.06.19	Email	Historic England confirm their acceptance of changes to Requirement 14 of the dDCO to clarify the potential role for Historic England should currently unknown and hence undesignated archaeological remains of national importance (or having the potential to be so) being discovered during delivery of the project.
01.10.19	Meeting	Discussion regarding Historic England's Relevant Representation and review and agreement of updates to SoCG.
19.02.20	Email	To issue the draft AMMS to Historic England for their review and to propose resolution of outstanding items in the SoCG currently 'under discussion'.
28.02.20	Email	Historic England agree to sign updated SoCG but raise several outstanding points which they require further discussion on including the draft AMMS; (3.1,5); 3.2.4; 3.2.14; 3.2.18 and 3.2.19.
15.04.20	Meeting	To review and discuss the feedback from Historic England on the outstanding items on the SoCG in advance of finalisation of SocG for Deadline 8.

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

3. Issues

3.1. General – archaeology and cultural heritage assessment & methodology

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
3.1.1	Listed buildings	Assessment methodology (grading)	Historic England disagrees with how listed buildings have been graded. All listed buildings should start from the base of high value, as being nationally designated. If a distinction is needed between grade II and grades II* and I, then the latter could be elevated to very high value.	Discussions with Historic England have clarified the assessment methodology and made the distinction between the significance of statutory protection and the significance in terms of Environmental Impact Assessment (EIA) regulations. The methodology is agreed.	Agreed
3.1.2	Listed buildings	Consents	No additional listed building consents will be required if there is no physical effect on them.	Noted	Agreed.
3.1.3	Heritage assets	Setting (Visual impacts)	Too much emphasis has been put on views to and from heritage assets (in terms of setting) and thus too little attention is paid to other ways in which a place can be experienced. A request for guidance notes was made.	Chapter 11 of the M25 junction 10/A3 Wisley interchange: 6.3 Environmental Statement [APP-056] clarifies the methodology for assessing the setting of heritage assets and discusses types and levels of impacts. Materials supporting these assessments have been provided to Historic England; no further request for information was made.	Agreed.
3.1.4	PIER	Scheme wide; general impacts	Historic England is not yet in a position to agree that the assessment of effects made in tables 11.1 and 11.2 of the Preliminary Environmental Information Report are correct or that they should	Consultation for the Environmental Impact Assessment (EIA) included supplementary assessment materials including Statements of Significance, Desk-based	Agreed.

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
			be carried through unaltered to the Environmental Statement (ES) - further information and discussion is requested.	Assessments, and meetings to review design plans, as well as submission of draft wording of the Heritage chapter of the Environmental Statement. Historic England agreed with the assessment of effects presented in draft Chapter 11 of the M25 junction 10/A3 Wisley interchange: 6.3 Environmental Statement [APP-056] at a meeting of 17.10.18 (Appendices (A) 9)	
3.1.5	Scheduled monuments in close proximity to junction 10	Impacts on unknown/other archaeological assets	Historic England advice is that the scheduled monuments are unlikely to represent the totality of the archaeological resource to be affected by the proposal, and non-designated archaeological heritage assets should be anticipated (both in areas for road infrastructure but also habitat creation and compound location). Historic England recommended that the DCO should require an outline Framework WSI be provided by the undertaker that sets out the overall approach to the assessment and mitigation of archaeological remains in order to provide a framework scheme and sequence for commissioning the detailed WSIs in relation to each part of the scheme. 15-04-20: Historic England accepts that Req.14 can be read in the way we	Agreed. The archaeological programme of works (Archaeological Strategy) Written Scheme of Investigations required by the CEMP [APP-134] Table page 52 (see ES Chapter 11, section 11.9 [APP-056]) will include details on the treatment of as-yet unknown archaeological remains of national importance. The CEMP is secured by Requirement 3 of the dDCO [APP-018]. In addition, Requirement 14 (Archaeology) of the dDCO [APP-018] requires that before any part of the Scheme is commenced, for that part, a Written Scheme for the Investigation and mitigation for archaeological interest, reflecting the mitigation set out in the REAC [APP-137], has been submitted to and approved by the Secretary of State, following consultation with	Agreed.

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
			have suggested because it refers to primary and secondary WSIs.	the relevant planning authority and the County Archaeologist. The requirement makes specific requirements for archaeological remains being revealed that were not previously identified involving reporting to the County Archaeologist in accordance with the process set out in Requirement 14 (Archaeology).	

3.2. Impacts on Designated Heritage Assets

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
3.2.1	Painshill Park	Scheme impacts	Historic England confirms their understanding that the grade II* Painshill Park House and its associated grade II buildings do not appear to be harmed by the proposals.	Noted	Agreed.
3.2.2	Painshill Park, Gothic Tower	Noise and visual impacts	Historic England is pleased that significant changes have been made to the proposal addressing previous concerns regarding the potential noise and visual impact on the grade I registered picturesque landscape and grade II* listed Gothic Tower.	Noted.	Agreed.
3.2.3	Gothic Tower and Painshill Registered	Land take	Historic England agreed that there would not be substantial impacts on historic sites. Land-take will not have a significant impact on the park due to	Noted	Agreed

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
	Park and Garden		the screening from the trees that will now be largely retained.		
3.2.4	Painshill	Scheme impacts; Gothic Tower.	Thought needs to be given to the physical and visual proximity of the bridge to the Gothic Tower and registered landscape, with the design endeavouring to be unobtrusive and sympathetic to its context. Historic England would wish to see details of the design and be consulted on their preparation and approval. 15-04-20: Historic England confirm that there is no requirement for them to be consulted on the detailed design of the bridge, where it has no effect on heritage significance. Consultation will be required for landscape and noise barrier design, as detailed in the CEMP. This is because as the mitigated effects of the scheme on the Gothic Tower, and therefore the bridge, its design and location, have been assessed as residual adverse	Agreed. The preliminary design as shown on the Scheme Layout Plans [APP-012 and APP-013] show these features. Reviews of the draft Development Consent Order (dDCO) design fix during consultation meetings noted that the historic visibility to and from the Gothic Tower required close consideration. The dDCO [APP-018] design fix was found to respect the sensitivity of the setting and meet the requirements of the Scheme without causing substantial harm to either the Tower or its setting. It was recognised that, due to the sensitive nature of the asset and its setting, landscaping proposals and changes should be reviewed during detailed design. Under Requirement 5 of the dDCO, the detailed design of the Scheme must be compatible with the preliminary design as submitted. Whilst there is no further requirement to consult, as is usual for schemes authorised by DCOs, the Outline CEMP [APP-134] (which is secured by Requirement 3 of the dDCO) includes the requirement for continued engagement with Historic England	Agreed.

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
				regarding landscape and noise barrier design (Table Appendix A1) where there is impact upon the settings of high value heritage assets (grade I and II* listed assets and scheduled monuments). Furthermore, Historic England will also have the opportunity to review the written scheme of investigations (WSI) during the early stages of detailed design. The WSIs will be included in the final CEMP.	
3.2.5	Painshill Park	Scheme impacts; Gothic Tower	Historic England considers that the immediate surrounds of the Gothic Tower II* listed building are important (not just views from it).	These comments have been addressed in the Statements of Significance and in the assessment of the setting of the Gothic Tower in Chapter 11 of the M25 junction 10/A3 Wisley interchange: 6.3 Environmental Statement [APP-056]. The Outline CEMP [APP-134] includes the requirement for continued engagement with Historic England regarding landscape and noise barrier design (Table Appendix A1) where there is impact upon the settings of high value heritage assets (grade I and II* listed assets and scheduled monuments). Historic England will also have the opportunity to review	Agreed.

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
				the written scheme of investigations (WSI) which will be included in the final Construction Environmental Management Plan (CEMP).	
3.2.6	Painshill Park, Gothic Tower	Re-location of power lines	Historic England is interested in the possibility of placing the power lines underground. Historic England acknowledges that undergrounding of power supplies is an expensive task but even a short length of this nearest the tower would be beneficial.	Discussions have taken place with Historic England on the challenges of this approach and it is agreed that this proposal is out of the scope of the current Scheme. However, this could be pursued through the application of Highways England Designated Funds.	Agreed.
3.2.7	Painshill Park	Scheme impacts; Painshill Park historic environment, (Turkish Tent; Temple of Bacchus)	In terms of the northern boundary of Painshill Park - Historic England wants to understand how much land would need to be taken from the heritage asset and how a new boundary would be formed with the remaining historic park. The contribution that the land currently makes to the significance of the designated heritage asset needs to be understood and this includes important structures close to this northern boundary. The Turkish Tent and the Temple of Bacchus are not designated heritage assets as they are recent recreations of lost features, but these are nevertheless contributors to the significance of the landscape and locations designed for a specific visitor experience.	Discussions with Historic England included a review of the DCO Design Fix and agreement that the proposed land take would not have an impact on the significance of the park, or its constituent designated and non-designated parts. The considerations made for local and emergency access, as well as for the gas compound, have been restricted in scope since the original design.	Agreed.

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
3.2.8	Painshill Park	Scheme impacts; noise	Details of any proposed acoustic barriers are requested. Historic England thinks that noise is a significant issue for the park and that baseline data should be obtained for the heritage assets now so that future effects can be demonstrated. The aim should be that existing noise levels are reduced, including by mitigation measures such as quiet road surfaces.	The M25 junction 10/A3 Wisley interchange: 6.3 Environmental Statement [APP-056] outlines the design mitigation for noise and landscape/visual impacts to provide additional mitigation for impacts to the settings of heritage assets. These include road surface materials and noise barriers to keep noise levels at or near current levels during Scheme operation, as well as landscape planting to restore the landscape screening impacted during construction activities. Assessments have concluded (as detailed in the M25 junction 10/A3 Wisley interchange: 6.3 Environmental Statement [APP-056] that the scheme will not have a significant adverse effect on the heritage assets due to noise, which is sufficient for the DCO. Improvement of the quality of the noise levels within the Park, where not related to noise from the Scheme, is outside of the scope of the DCO. In meetings held on the 17.04.19 (A13) and on 01.10.19 (A16) Historic England confirmed that they are in agreement with the findings of the assessments, are comfortable with the principle of what is being proposed and agree	Agreed

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
				that Atkins have worked hard to minimise the harm. Whilst there is no further requirement to consult, as is usual for schemes authorised by DCOs, the Outline CEMP [APP-134] (which is secured by Requirement 3 of the dDCO) includes the requirement for continued engagement with Historic England regarding landscape and noise barrier design (Table Appendix A1) where there is impact upon the settings of high value heritage assets (grade I and II* listed assets and scheduled monuments). Furthermore, Historic England will also have the opportunity to review the written scheme of investigations (WSI).	
3.2.9	Painshill Park	Scheme impacts; noise	Historic England suggests that the possibility of extending the noise barriers around junction 10 (which in the current proposal stops west of the new bridge) and along the boundary of the registered landscape stretch of the A3 should be considered. We question whether it is understood what impact they have both visually and audibly. Noise at Painshill Park impacts visitor experience as well as the ability of the site to earn essential income from filming opportunities. Historic England thinks that the goal needs to be to	Assessments have concluded (as detailed in the M25 junction 10/A3 Wisley interchange: 6.3 Environmental Statement [APP-056] that the scheme will not have a significant adverse effect on the heritage assets due to noise, which is sufficient for the DCO. Noise levels within the park are not expected to noticeably increase. Improvement of the quality of the noise levels within the Park for tourism purposes is outside of the scope of the DCO. In addition, site	Agreed.

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
			improve upon existing noise levels and not make the situation any worse.	visits have identified the majority of noise within the park coming from overhead flights and not road noise. Also of note is that sound engineers in film and television routinely remove background noise during production as required. The Environmental Statement (APP-056) and the Statement of Significance (APP-123) addressed the visual intrusion of the proposed Scheme as part of the assessments on setting. The Outline CEMP [APP-134] includes the requirement for continued engagement with Historic England regarding landscape and noise barrier design (Table Appendix A1) where there is impact upon the settings of high value heritage assets (grade I and II* listed assets and scheduled monuments).	
3.2.10	Painshill Park	Future development	There is concern that any form of development in the area could provide a green light for future development.	An objective of the Scheme is to support projected population and economic growth in the area. Any proposals for future development that may arise will be subject to the planning process under the Town and Country Planning Act 1990 (as amended). Painshill Park is designated parkland, including the areas that	Agreed.

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
				have been sold. This area is also located within greenbelt land, which, along with the Park and Garden designation, extends to the A3. The proposed access route is a private means of access to New Farm, Heywoods Camp site and Court Close Farm as well as maintenance vehicles.	
3.2.11	Royal Horticultural Society (RHS) Wisley	Access	Historic England notes that the non-statutory consultation has reverted to the existing access arrangement to the Garden. Historic England is content with this, providing it supports the sustainable operation of the heritage asset now and in the future, including for its role as a major visitor attraction.	The current proposal replicates the existing arrangements and is considered to enable sustainable operation of the heritage asset.	Agreed.
3.2.12	RHS Wisley	RHS Wisley; Scheme design	More detail is required on the design of construction within RHS Wisley at the north-east corner where the existing footbridge will be rebuilt as a road bridge. Historic England wants to consider this before agreeing what the effect on the significance of the heritage asset will be.	The Scheme design near RHS Wisley has been modified to address concerns raised by RHS Wisley and Historic England. In pre-Environmental Statement meetings.	Agreed
3.2.13	RHS Wisley	Impacts on conservation areas and/or listed buildings (traffic) during construction and as a result of the Scheme.	Historic England wants to be satisfied that traffic movements will not have an adverse impact upon nearby settlements where these are conservation areas, contain listed buildings or both. For example Ripley is a conservation area and although it has origins as a settlement on the old A3 Historic England will be interested	Traffic management plans will be in place to limit the need for diversions through nearby settlements, including Ripley, Ockham, and Cobham Conservation Areas. Details of these measures are contained within the Outline CEMP [APP-134] and will be further developed by the	Agreed.

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
			as to whether through traffic there will be increased and what the effect on historic environment significance might then be.	contractor. No significant impacts are anticipated on these areas as a result. The Traffic Assessment for Scheme operation demonstrates that traffic will continue as it does presently. Any increases will not impact on heritage assets.	
3.2.14	RHS Wisley	Visual impacts; (signage/lighting)	Historic England wishes to know more about any signage (including gantries) and lighting on the A3 and whether these are visible from within the registered landscape at RHS Wisley. Historic England understands from the assurances given in the teleconference on 15.04.20 that the lighting would largely be replacing existing lighting in the same locations and would have little impact on the significance of RHS Wisley.	Additional engagement will be included with Historic England regarding signage and lighting as a condition of the Outline CEMP [APP-134]. Details of lighting and signage are contained in the preliminary design as shown on the Scheme Layout Plans [APP-012 and APP-013]. The impact of the Scheme on the setting of RHS Wisley is included in the Environmental Statement, which did not identify the road lighting levels to contribute or detract from the significance of the asset. The Outline CEMP [APP-134] also includes the requirement for continued engagement with Historic England on the detailed design.	Agreed.
3.2.15	RHS Wisley	Scheme impacts; noise	Historic England is interested in how quiet road surfaces and acoustic barriers might lessen noise and how proposed works might change the character of the existing interface between the A3 and RHS Wisley.	The Scheme includes a low noise surface on all lanes of the A3, not just the additional lane. The noise predictions with this surface indicate that the change in noise levels with the scheme would be negligible and that no further	Agreed.

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
				mitigation of noise levels would be necessary. The Scheme includes a retaining wall along the northbound A3 past RHS Wisley which would ensure that there would be no encroachment into the gardens. The Outline CEMP [APP-134] includes the requirement for continued engagement with Historic England regarding detailed design, where there is impact upon the settings of high value heritage assets (grade I and II* listed assets and scheduled monuments).	
3.2.16	RHS Wisley	Scheme impacts; noise	There is concern about the experience people will have at RHS Wisley, be these visitors or staff employed there, which is part of how its significance is appreciated. Historic England will wish to understand how noise levels will be affected by the proposals and it is suggested that data should be obtained for the designated heritage asset. The aim should be to achieve an improvement over the existing situation and certainly not to make matters any worse.	Noise assessments as outlined in the M25 junction 10/A3 Wisley interchange: 6.3 Environmental Statement [APP-051] indicate that there will be no noticeable long-term change in the noise levels at RHS Wisley. Temporary increases due to construction activity will be addressed in the M25 junction 10/A3 Wisley interchange 7.2 Outline CEMP [APP-134] and will be taken forward by the appointed contractor in the Construction Environmental Management Plan. The Outline CEMP also includes the requirement for continued engagement with Historic England regarding detailed design, where	Agreed.

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
				there is impact upon the settings of high value heritage assets (grade I and II* listed assets and scheduled monuments). Historic England have agreed (A16, meeting 01.10.19) that the proposed Scheme is not required to improve visitor experience at RHS Wisley. Historic England recognise that the traffic management plans are sufficient to address the significance of RHS Wisley.	
3.2.17	Roman bath house at Chatley Farm and Red Hill hengiform monument	General scheme impacts	There is concern for the future of the Roman bath house (which is included on the Register of Heritage at Risk as being in a declining condition) and for the potential of works that could cause harm to any as yet unrecognised but potentially nationally important archaeological remains and for the setting of the scheduled bathhouse. Whilst we agree that the scheduled areas of these monuments will not be directly affected, we retain concerns for how changes as a result of the project may affect the contribution that their settings make to their significance. In particular we have in mind ecological/landscape compensation activities which might change the settings. This change could be either beneficial or harmful and we	The area around the bathhouse has been removed from the Scheme. No habitat enhancement works take place within the boundary of the Roman Bathhouse and the hengiform monument and therefore neither will be affected by the habitat management works. The archaeological programme of works (Archaeological Strategy), Written Scheme of Investigations required by the Outline CEMP [APP-134, Table page 52] will include details on the treatment of as-yet unknown archaeological remains of national importance (see also section 11.9 of ES Chapter 11 (APP-056) The strategy will also	Agreed.

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
			note that new tree planting is unlikely to be proposed as enhanced heathland environments are the desired outcome. Actions to achieve this could impact any undesignated archaeological remains outside of the scheduled areas and there is some possibility that these could have the same significance as the scheduled monuments themselves. We think that archaeological evaluation will be needed to understand the implications of any works and that based on the results of this "works" should be carried out in minimally harmful ways that will need to be set out in method statements and designs	outline the process for consultation during detailed design. In addition, Requirement 14 of the dDCO [APP-018] requires that before any part of the Scheme is commenced, in this respect a written scheme for the investigation and mitigation for archaeological interest reflecting the mitigation set out in the REAC has been approved by the Secretary of State following consultation with the relevant planning authority and County Archaeologist. The requirement makes specific requirements for archaeological remains being revealed that were not previously identified involving the reporting to the County Archaeologist in accordance with the process set out in requirement 14. The Outline CEMP also includes the requirement for continued engagement with Historic England to develop mitigation for any potentially nationally important archaeological remains. This will take place during detailed design as part of the requirements of the DCO.	

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
3.2.18	Scheduled monuments in close proximity to Junction 1	Enhancement to setting (Prehistoric barrows)	The changes made in the proposal substantially change the advice that Historic England has previous provided. Historic England wants to be involved in looking for opportunities to enhance the setting of the prehistoric barrows close to the existing junction through measures that will provide visual and aural screening on the enhanced junction.	Agreed. Details of this will be included in the Outline CEMP [APP-134] and in the archaeological programme of works (Archaeological Strategy). The strategy will include details outlining the process for consultation on detailed design. Highways England will continue to liaise with Historic England during detailed design as required by the Outline CEMP. The final CEMP and Archaeological Strategy will ensure impacts on the prehistoric remains on Cockcrow Hill are addressed from a landscape perspective and not simply as isolated monuments, so as to include the Cockrow Hill Barrow and the Bowl Barrow west of Cockrow Hill. (agreed at meeting on 15.40.20 A18)	Agreed.
3.2.19	Scheduled barrows close to junction 10	General scheme; noise impacts; impacts on unknown/undesign ated archaeological assets.	Historic England consider it sensible to agree and implement improved management of the barrows as a pair with regards to mitigation for any harm to either scheduled monuments. This would be a heritage benefit which could include the research potential in better understanding the significance of the archaeological remains and interpreting this to visitors. It is acknowledged that the barrow is not directly impacted by the proposals but parts of the enlarged junction 10	Noted. As discussed at a meeting on 15.04.20 (A18) the management of the Barrows is not within the remit of Highways England as the land is managed by Surrey Wildlife Trust (SWT). Highways England and Atkins will liaise with Historic England to develop mitigation for the barrows	Agreed.

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
			would be closer to it and this raises issues for its setting, both visually and for noise. There is very clear noise intrusion at present and we suggest that baseline noise data at the designated heritage asset should be obtained now so that the effects of the proposed changes can be demonstrated. The aim should be to reduce harm from such issues. The solutions for how best to limit harm to the significance of the scheduled barrow will need to be based on an enhanced understanding of the potential for other archaeological remains in its surrounds, be these visible as earthworks or buried. Historic England understands that walk-over surveys and the use of LIDAR data has taken place - Historic England will be pleased to see the reporting for this, probably as a desk-based report. Historic England thinks that some intrusive investigations may be needed in order to evaluate the archaeological potential of the land in which new road construction or mitigation measures will take place. Discussions will be welcomed on the probable need for trial trenching and the timing of this i.e. before or after a DCO application. The aim should be to understand the potential for nationally important but undesignated archaeological remains associated	and other features affected by the Scheme, particularly in respect of noise and visual impact. This will take place during detailed design as part of the requirements of the Development Consent Order and of the Outline CEMP. The Environmental Statement is supplemented with an archaeological desk-based assessment to provide additional information of the archaeological potential of the area [APP-122]. In addition, the Outline CEMP also requires an archaeological programme of works (Archaeological Strategy). This will include details outlining the process to be followed for: • The identification and treatment of as-yet unknown archaeological remains of national importance; • The process for consultation on detailed design. The final CEMP and Archaeological Strategy will ensure that provision is made to understand the potential for nationally important but undesignated archaeological remains associated with the barrows where there is a potential for impacts, and such evidence will	

	Issue	Sub-section	Historic England Comment	Highways England Response	Status
			with the barrow site since the presumption should be that such evidence is preserved in situ. Investigation to provide a record of significance would be a less good outcome.	be preserved in situ unless there is clear and convincing justification for their loss (agreed at meeting on 15.04.20 A18)	

Appendices

Appendix A. Correspondence

A.1 Meeting with Historic England (21.02.17)

ATKINS

Meeting notes

Project:	M25 Junction 10/A3 Wisley Interchange		
Subject:	Meeting with Historic England		
Date and time:	21/02/2017	**Meeting no:**	1
Meeting place:	Historic England - Guildford	**Minutes by:**	[redacted]
Present:	[redacted]	**Representing:**	Historic England Historic England Historic England Highways England Historic England Atkins Highways England Atkins Atkins Atkins Atkins

[redacted] **started the meeting by giving a brief overview of the scheme**

In 2014, Government published a Regional Investment Strategy (RIS) coming up with 112 schemes, which included the M25 Junction 10/A3 Wisley Interchange scheme.

There are significant problems associated with congestion at the M25/A3 junction, which are acting as a block on economic growth. The junction also has the highest accident rate of any motorway junction in the country.

Highways England has committed to a programme of delivering this improvement, with the aim of starting work on site in 2019/2020 and completing the works by 2022/2023. This represents an ambitious programme bearing in mind the statutory procedures including the Development Consent Order process.

Non statutory consultation was undertaken 5th Dec 2016– 6th Feb 2017. The public were consulted on 2 principal options for the junction (options 9 and 14), together with proposals for widening the A3 from dual 3 lanes to dual 4 between the Painshill junction in the north and the Ockham interchange in the south and some additional widening on the A245 to the west of Painshill. The consultation materials also included information about a third option that had been considered as it fulfilled the RIS requirements for free flow links in all directions, but which had been rejected option, as it was felt that the scheme could be delivered at lower cost for similar benefit.

The intention is to go through the DCO process beginning in mid 2018.

For safety reasons and given the proposals to widen the A3, the scheme also includes proposals to stop up existing private access points that connect directly to the A3. It was explained that solutions for achieving alternative access arrangements are still under investigation.

For the San Domenico site there is the option to run service road via Redhill Road or Seven Hills Road.

Next meeting:	
Distribution:	
Date issued:	**File ref:**

NOTE TO RECIPIENTS:
These meeting notes record Atkins understanding of the meeting and intended actions arising therefrom.
Your agreement that the notes form a true record of the discussion will be assumed unless adverse comments are received in writing within five days of receipt.

Contains *sensitive* information
Meeting notes - Historic England 21.02.17 FINAL

Contains *sensitive* information

ATKINS

[redacted] emphasised the aim to work with Historic England as the project progresses towards a DCO application, particularly with a view to reaching agreement as far as possible on matters such as baseline information, the methods of assessment, the significance of the heritage assets and the extent of their setting and schemes for mitigation having regard to the likely effects of the proposed scheme.

Junction options – [redacted] provided further detail of the options and the implications for existing side road access

Option 14 – The elongated roundabout. This option would provide additional capacity for around 10 years before it is modelled to be over capacity. This doesn't meet the 15 year design year requirements for the scheme. Key features include:

- Free flow left turns on all arms of the roundabout.
- Stretching the roundabout to provide more capacity on the roundabout (at the same level as existing).
- Would retain the structure of the roundabout and use it for non motorised users.
- This option doesn't provide much advantage in terms of safety.
- It is quite a bit cheaper than the other option.

Option 9 –The flyover option. Existing roundabout to be retained

This option provides better improvements in terms of traffic flow and safety when compared to option 14.

Key features include:

- Provides free flow movements for the the busiest right turns.
- Dedicated left and right turning from the A3 onto the M25.
- This is an extra level above the A3. Structure would site 7m above the current A3 overbridge, and would most likely have to be lit.
- M25 right turns onto the A3 will remain signalised.

Third option was to provide something that was fully free flow. Similar to the current arrangements on junction 12 of the M25. It does address the transport issues, but has a larger footprint than Option 9, requiring some 50-60 hectares of land..

The scheme is also proposing to close Elm Corner and looking at the possibly of re-providing this via Old Lane. Also need to provide access to the Farm and scout campsite on the west of the A3 away from the junction.

Options for Wisley Lane. Closing it up and providing a service road to the south is one option. Other option is a similar service road to the South. Tunnel or bridge to the other side and connecting in to Ockham junction.

Having direct access from properties to the A3 is very much not desirable. RHS Wisley Gardens have significant numbers of visitors.

Service roads are additional to the extra lane. There would also be screening between these. We would also want to include cycle and walking routes within these as well. We are looking to make an improvement to the walking and cycling facilities in the vicinity of the scheme.

Historic England queried whether on any of the local access proposals the existing customer entrance to Painshill Park would be affected. Atkins confirmed Customer access to Painshill Park would be unaffected. One of the Painshill access options would affect the existing tradesman's access via the A245.

Historic England Early Feedback

[redacted] advised that Historic England's main concerns relate to the potential effects on a group of scheduled monuments close to Junction 10 and to the potential effects on the registered parks and gardens at Painshill and Wisley. At this stage, Historic England have not had the opportunity to consider the potential effects on listed buildings in any detail and [redacted] emphasised the significant potential for other non-designated as yet undiscovered remains to be present in the area. It was recommended that the design

Contains *sensitive* information

ATKINS

team consult with the County Archaeologist on undesignated assets and with the local authorities regarding grade II listed buildings.

Ancient monuments and archaeological remains – [redacted] provided an initial assessment of the potential impact on scheduled monuments in proximity of the site

Two barrows that might be affected situated to the SW of J10:

1. Bell barrow (NHLE 1012204) – quite a rare type of bronze age prehistoric monuments. Only about 250 identified across the country. High status burials, usually of high status males. Barrow with a ditch around the outside.
2. Bowl Barrow (NHLE 1012205)– approximately 10,000 of these designated nationally. Also a funerary monument similar to the above.

Another monument (NHLE 1007905) to the north-east of the Junction: Hengi-Form. Neolithic monument. Part of monumental ceremonial type. This is a small type of henge. This is the only identified preserved one in Surrey and there are approximately 24 or 25 nationally. Often associated with other features in the landscape near to them.

Barrows are rarely built in isolation and areusually a ritual focus in the immediate landscape. You often tend to find features between them. Other types of activity going on like post holes etc. Important to understand them as part of a wider ritual and historic landscape. The close proximity of the different monuments suggests a continuity of use within the landscape.

[redacted] stated that they haven't been investigated in detail. It may be difficult to identify what other features there are in the landscape, because of the existing scrub and tree cover. This does create a conundrum in terms of not necessarily knowing what the additional impact might be.

Effects of the options on the monuments and their setting.

[redacted] enquired about whether Historic England had formed a view on the extent of the setting of the scheduled monuments at present. [redacted] confirmed not at this stage but that Historic England would be expecting Highways England to undertake full analysis of this as part of their heritage assessment. [redacted] emphasised that the setting is likely to include the wider historic landscape and that there will be a relationship between the two barrows to the SW of the junction. Historic England's team acknowledged that the presence of the M25 and A3 and junction 10 infrastructure already has a significant adverse effect on the setting of some assets/features in close proximity with the roads, including the Bell Barrow.

The areas a little further away provides a sense of an open landscape. We assume that there were sight lines between them. You can get a chance to appreciate of what they were originally like.

[redacted] asked about the issue of openness – is that something that should be thought about in terms of the level of risk and impact on the site? [redacted] said that it does need to be considered carefully in respect of the setting of the monument.

[redacted] advised that these are not currently formally assessed as at risk. Not currently identified as needing active management. Usually when there is direct physical impact on monuments this tends to be the triggers for 'at risk' rather than the effect on the setting.

It might be possible to use LIDAR to identify earthworks etc. HE would expect to see some of these techniques. Atkins currently have LIDAR for the area. We are looking at that to minimise the new data that we need. Need to think about the resolution at what the LIDAR has been created. At some resolutions it doesn't effectively show up the archaeological data. Might need an archaeologist to do that. [redacted] happy to have a look at this.

[redacted] stated that the impact of the slip road in option 9 severs one barrow from another and this would be a significant concern. It would isolate the bell barrow from its wider historic landscape and so the impact on this asset is likely to be much greater than on the Bowl Barrow.. The more extensive landtake associated with Option 9 is also likely to give rise to a greater impact on as yet unidentified archaeology in the area compared with Option 14. Similar issues with the henge monument.

Contains *sensitive* information

ATKINS

The additional height of strctures such as a flyover, and quite possibly more lighting would have more visual impact on the sites than previously. This may also have quite a significant impact and would need to be assessed..

HE consider that an elongated roundabout is much less harmful. However, new development would still be coming closer to the bell barrow. Much lower risk of damaging unidentified archaeology.

[redacted] pointed out that with option 9, the northbound slip road from the A3 would see much lower use.

[redacted] expressed concern about the potential effects on the setting of the Hengi-Form Scheduled Monument due to the proposed A3 southbound to M25 eastbound link.

In terms of mitigation there could be bunds or environmental barriers. Bunds could be landscaped to match the existing landscape in the immediate vicinity.

[redacted] queried whether the sites are currently actively visited. Historic England stated that there probably isn't a huge amount of active visiting of the sites, although a site visit by its staff will be required to ascertain this further.

[redacted] as what is the intention from Historic England's point of view with these sites? [redacted] stated that Historic England would pretty much leave them as the status quo. If as a result of the visit it is established there are management needs, then this would be raised with the landowner.

Historic England stated that they are concerned particularly when monuments are isolated as this is when they would become neglected. [redacted] stated that access would be maintained but acknowledged this would make it significantly less desirable.

[redacted] also stated that there is a roman bathhouse site on the edge of Painshill Park. This site also requires further investigation. Bath houses are rarely sited in isolation so it is likely there would a villa structure of similar very close to the bath house remains.

Anglo Saxons – there may also be some post roman remains e.g. as prehistoric barrows are often re-used for burials

[redacted] advised there has recently been a planning appeal decision about setting. The planning inspector judges concluded that harm is a spectrum and that less than substantial harm was in this case still an important factor such that he dismissed the appeal by Bath University for a car park near to a Hill Fort. https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3138529&CoID=0

The meeting agreed that all parties would like to have as much agreed as a statement of common ground as possible and whittle it down to the areas of major concern/significant impact.

[redacted] enquired whether Historic England is likely to consider the degree of harm to the setting of the Bell Barrow scheduled monument to be substantial with Option 9. [redacted] and [redacted] indicated that this is a possibility., although further investigation would be required.

Historic England's job is to advise on the heritage impacts. Historic England want to explore the ways in which the impact can be minimised. Looking to seek reassurance from Highways England that alternatives with lesser impacts have been considered. Demonstrate the option that we are going forward with has to be made in the round. [redacted] confirmed that Historic England would not be testing the case on need for development and the balanced judgement between benefits of the scheme and impacts on cultural heritage would be a matter for the examining authority.

Parks and Gardens – [redacted] provided a view on the impact on Parks and Gardens

Painshill Park: Grade 1 listed
[redacted] emphasised that Historic England had not been provided with details of the additional local access proposals that could affect the park, so initial comments being provided relate to the main scheme options and the information available in the public consultation documentation.

Contains *sensitive* information
Meeting notes - Historic England 21.02.17 FINAL

Plan Design Enable

Contains *sensitive* information

ATKINS

Park and Garden has undergone a huge amount of restoration in recent decades. 18th Century garden designed by Charles Hamilton.

Originally designed to be a tranquil experience. Existing A3 has somewhat harmed that experience and noise is a significant issue for the setting of the Park. Throughout much of the park visitors experience a background hum from the A3. There isn't significant road noise until the end of the Serpentine lake and onwards south to the Gothic tower. The A3 is very close to the Gothic Tower. As part of the assessment, Historic England would wish to see noise levels modelled for locations within the park

To introduce any new vehicular access into the park would be very undesirable. The existing routes are based on the original carriage routes placed in the park when it was designed and built.

The slip roads for Option 9 would be likely to further enclose the views of the Gothic tower and loss of trees from the park edge would be a concern.

A views analysis assessment would need to be undertaken. Clearly winter is a good time to be able to do this as this would offer a worst-case scenario for changes in views and visual impacts on setting. Montages would be helpful as part of the assessment.

In terms of mitigation, [redacted] suggested that planting rather than bunding may be a better approach.

Historic England also noted that any overhead gantries and their visual impact would need to be considered.

Wisley – Grade II* listed

RHS Wisley – the significance of the Park is very different to Painshill. Tied up more with horticultural interest. Trial beds are closest to the road as it stands. Currently an area of lower significance potentially. Impacts are likely to be less than for Painshill. Still do hear noise from the A3. There is a small amount of the potential land required for the A3. Access road issue will be more interesting in terms of their numbers of visitors.

Initial impressions are that Historic England will be less concerned about the effects of the scheme on RHS Gardens Wisley than potential effects on Painshill Park.

Historic England pointed out that given the height of structures and the links in option 9 the spatial scope of the heritage assessment will need to be drawn more widely as the potential for greater impacts and over longer distances is possible. [redacted] confirmed that it would be possible to establish a Zone of Visual Influence.

[redacted] requested in terms of the comments submitted - if there are other issues that things should be looked at that would be very useful. [redacted] mentioned that we are only at the start of the engagement, we expect this to go through many more stages.

Historic England suggested that HE should speak to the Guildford BC and Elmridge BC conservation officers to look at the grade II listed buildings and any potential impacts on these. Historic England also advised that the Chatley Semaphore Tower (II* listed) is the only surviving tower of its type and its significance is heavily reliant on its historic sight lines..

It was agreed that Historic England would issue its comments on the proposals so far in writing within the next 2 weeks. Highways England invited Historic England to get in touch if they needed any further information and [redacted] undertook to provide a plan showing possible options for providing alternative access arrangements for those affected by proposals to stop-up the proliferation of direct private accesses on to the A3.

Highways England thanked Historic England for their time and providing insight into the significance of the heritage assets in the vicinity of the junction

Contains *sensitive* information
Meeting notes - Historic England 21.02.17 FINAL

Plan Design Enable

Contains *sensitive* information

A.2 Letter from Historic England (08.03.17)

Historic England

[redacted]
Atkins Limited,
Epsom Gateway,
Ashley Avenue,
Epsom,
Surrey
KT18 5AL

Our ref:
Your ref:

Telephone [redacted]
Fax

08 March 2017

Dear [redacted]

re: M25/A3 - Junction 10 - proposed improvements by Highways England

Thank you for meeting us on 21st February to explain the emerging proposals to upgrade J10 of the M25 and to improve associated sections of the A3. I am now able to provide our preliminary response. This is based on the information from the recently closed public consultation and to some extent the maps for possible access options at Wisley and Painshill (Marc Woodall's email of 21st February).

We accept that there is a strong case to address the current issues for the safe and efficient operation of the motorway junction and our intention is to help you to find solutions that will avoid, minimise and mitigate any harm to the historic environment. Our key concerns relate to the designated heritage assets and their settings which will be affected. These can be broadly divided into the scheduled monuments and the registered parks and gardens. There are also other listed buildings potentially affected by the emerging proposals and also potential for undesignated heritage assets (specifically those of an archaeological nature) to be harmed.

1. **Scheduled Monuments and other undesignated archaeological remains**

We have focussed most on the prehistoric scheduled monuments closest to Junction 10 but there is also the Roman bath house at Chatley Farm (NHLE 1005923).Such sites do not exist in isolation and are often indicative of a nearby villa. This potential should be explored further as part of assessment of the likely archaeological effects of the works.

There are three prehistoric scheduled monuments close to the existing J10.

- NHLE 1007905 -Hengiform monument at Red hill.

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

- NHLE 1012204 – Bell barrow on Cockcrow Hill
- NHLE 1012205 – Bowl barrow west of Cockcrow Hill.

Hengiforms are mid to late Neolithic ritual or ceremonial centres closely connected with burial. They were flat, roughly circular enclosures with a surrounding ditch and external bank. With at least one entrance into the interior, they often have pits, cremations, graves and postholes within them and may have associated features around the perimeter. These are a very rare monument type with only 24 examples known. Despite some disturbance from quarrying, this example survives comparatively well. Hengiforms are frequently found in association with other archaeological evidence. The example at Shepperton had an adjacent occupation deposit and pit row and also later phases of Bronze Age activity which indicate that it had remained an important part of the landscape.

Barrows are mainly Bronze Age in date funerary monuments, constructed to cover or contain burials, often with associated grave goods. Bowl examples are the most numerous form of barrow, whilst Bell barrows are particularly rare, with very few being located outside Wessex and less than 250 identified nationally. The survival of adjacent bowl and bell barrows gives a valuable insight into the nature and scale of human occupation in the Bronze Age. Despite the intrusion of the main road junction the barrows survive as visible earthwork monuments within a moderately rural setting which expands out to the west, and which may offer a basis for understanding contemporary prehistoric landscapes.

It is unlikely that barrows were created as individual monuments isolated from their surroundings. These are now seen as part of a 'spiritual landscape', with an increasing emphasis during the Neolithic and Bronze Age on locations and landforms. The placing of groups of burial monuments can be understood as some form of spiritual divination of the landscape. This hypothesis is supported by the hengiform monument which lies a short distance to the north east of the barrows. It is common for barrows to be orientated on certain focal points in the landscape. There is increasing evidence that these principles also extended into the spaces between structures, with seemingly insignificant areas of ground containing related features such as post alignments, flat graves and urned cremations. It is likely therefore, that the two barrows had a clear relationship with each other and were designed to be inter-visible within the landscape, and that the land between the barrows can be expected to have an enhanced potential for discovery of associated features.

We discussed how the existing scrub and tree cover at the site will make it difficult to carry out walk over surveys designed to identify as yet undiscovered archaeology, but this should still be carried out and be informed by information in the Surrey Historic Environment Record. We advise that the Surrey CC archaeological curators be consulted as early as possible for their knowledge of this and similar parts of Surrey. We discussed how LIDAR might be a technique to identify otherwise slight earthworks or those obscured by tree cover. It was agreed that existing LIDAR data would be reviewed. Its usefulness will be affected by the resolution at which the data was acquired.

The two junction options that were consulted upon each have implications for the prehistoric scheduled monuments and their settings.

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Option 9 – 4 level flyover

Option 9 would be harmful to the scheduled Bell barrow (NHLE 1012204), an asset of high value, through changes to its setting. The existing junction is already harmful, but under this option the junction would be enlarged with the new slip road from the eastbound A3 onto the M25 meaning the monument would be surrounded by roads on all sides. This would sever surviving landscape links between the barrow and its surrounding land, from which it derives significance. This would permanent major adverse impacts which are significant. The amenity value of the monument, as a feature which can be visited would be severely harmed were it to become isolated within a major junction. Issues for setting are primarily a visual consideration but here would also include noise.

Option 9 would also harm the scheduled Bowl barrow (NHLE 1012205), another asset of high value and again as a result of change within its setting. Although the existing junction forms part of the existing setting, Option 9 would expand the junction with the new slip road from the eastbound A3 onto the M25 bringing the junction infrastructure within 200m of the barrow, and severing the surviving landscape link between this barrow and the Bell Barrow to the south east. This would result in permanent moderate adverse impacts, which are significant.

Option 9 also has the potential to harm the scheduled Hengiform monument (NHLE 1007905), an asset of high value, through changes to its setting. The scheme would expand the junction with the new slip road from the westbound A3 onto the M25 bringing the junction infrastructure within approximately 300m of the monument. This would constitute permanent moderate adverse effects, which are significant.

As indicated above there is a real possibility of as yet unidentified archaeological remains in the land associated with the 3 scheduled prehistoric monuments and some of these could be of national importance. The larger the land take for a rebuilt junction the more likely it is that undesignated archaeological remains would be affected.

To date no drawings are available of what a flyover would look like but we understand that the deck could be 8 m off the ground and that it would require safety barriers and lighting. The visibility of the new structure would need to be modelled from each of the scheduled monuments, with and without mitigation proposals such as screening through planting. Additional planting has the potential to harm any undesignated archaeological remains. A zone of theoretical visibility would be needed for a new flyover and based on this it might be visible from heritage assets at some distance from Junction 10. These would need to be assessed for any harm that this might cause.

Option 14 – elongated roundabout

Option 14 would harm the scheduled Bell barrow (NHLE 1012204), an asset of high value, through changes to its setting. The expanded junction would take place within 100m of the monument. The existing junction is already harmful and so the issue might be how much more harm would this option cause, allowing for the potential to screen the barrow from the expanded junction by tree planting. The completed scheme would bring

the movement of traffic closer to the monument to the east, further degrading its setting. This would constitute a permanent moderate adverse impact, which is significant.

Option 14 would harm the scheduled Bowl barrow (NHLE 1012205), an asset of high value, through changes to its setting. The construction of the expanded junction and M25 slip roads to the north of the junction may be visible in filtered views from the monument, and the setting of the monument would be further degraded by noise. This is likely to cause a slight adverse impact, which would not be as significant as for the barrow closest to the junction.

This option appears to require a lesser additional land take than option 9 and therefore the potential for harm to undesignated archaeological remains could be lower. Without the need for such a major structure as a flyover, the finished works under this option are less likely to be visible than for option 9.

2. Registered Historic Parks and Gardens

There are two such designated heritage assets which would be affected by the proposals.

- NHLE 1000125 Painshill Park – grade I
- NHLE 1000126 Royal Horticultural Societies Gardens, Wisley – grade II*.

We think that works to improve Junction 10 have the potential to cause harm to Painshill Park, principally through changes within its setting. It appears that less harm would be caused to Wisley by the junction works, based on changes to its setting. However it is the proposed works to widen the existing A3 and to stop up existing roads, such that these must then be replaced by new local distributor roads, which are potentially most harmful to both sites. As a principle we advise that options which avoid intrusion of new roads within the boundaries of the registered landscapes should be explored.

Painshill Park

Painshill is one of the finest surviving examples of an 18th Century English landscaped park, as reflected by its highest grade. It was laid out between 1738 and 1773, chiefly by Charles Hamilton. The site design contains a series of "*living pictures*" created for the enjoyment of visitors (including as they drove around the park in carriages) and intended to provoke emotions. These effects are created by the interplay of the modelling of the land, the lake and watercourses, by tree planting and importantly through a large number of statues, landscape buildings and other structures, such as bridges and a grotto. These features are individually listed. Also listed at the northern end of the park is Painshill House (NHLE 1030132 grade II*). The listed building closest to Junction 10 is the grade II* Gothic Tower (NHLE 1191694) which is a four stage brick tower forming part of the park from the early 19th Century and from which long views are available.

Works to reform Junction 10 might not have a significant adverse impact upon the significance of Painshill Park, largely as a result of the large amount of existing trees that separate it from the heritage asset. Nevertheless the potential for harm arising from changes to the setting of the park should be assessed based on the land take needed for either option

9 or 14. Option 9 has the highest potential to cause harm as an elevated flyover and its associated features are more likely to be visible from within the park. We have visited the Gothic Tower and views from the upper parts of this will need to be considered to determine if under either option the rebuilt junction would be visible. We acknowledge that the existing setting of the tower is not ideal, specifically due to the adjacent electricity pylons, but additional harm from road improvement could create additional cumulative harm.

The existing A3 is visible from the tower, particularly at this time of year when the trees are not in leaf, and these views also require consideration. We suggest that the most significant effect of the modern roads for appreciation of the historic park derives from the noise with hinders the ability to enjoy the garden in the way that its creators intended. The potential for increased noise levels will need to be carefully assessed, especially if widening of the A3 and the provision of new access roads will mean increased traffic closer to or within the park. There are at present screening effects for the A3 (at least in visual terms) created by the tree planting on the NW boundary of the park. We are concerned that new access roads could reduce that screening and introduce inappropriate new features within it. We have yet to fully assess the options for new access roads that have been provided. We think that land take from the registered park should be avoided, but if this becomes unavoidable, it should be both minimised and appropriately screened so that the net visual and noise effects on the park are limited. Painshill Park operates as a heritage site open to the public and we wish to ensure that road improvements do not harm the ability of the site to continue to function. We have similar concerns for how new access roads might effect Painshill House and its setting. We will visit Painshill Park in the next few weeks and we shall let you have any additional comments.

RHS Wisley

The gardens at Wisley have a very different in character to Painshill Park. They too are enjoyed as a landscape to be visited but a large part of their significance is bound up in their plant collections and specimens and in the long established experimental activities there which are on-going in the present.

The harm that could be caused at Wisley by the proposed road improvements is not based on the Junction 10 works but rather the need to re-provide access roads as a result of a widening of the A3. We are still reviewing the options for the new roads but we are likely to favour those which avoid or minimise any land take from the registered park and garden at Wisley. We understand that some important historic specimens of trees could be threatened under some of the options and that issues from road related pollution could endanger the longevity of others. It seems unlikely that all important trees and plants could be trans located. We think that there will be issues for the significance of the site if new roads and traffic result in harm to views out from the gardens, but we are also concerned about increased issues for road noise.

We are aware of the ambitious plans for the future of the gardens at Wisley in the 21st Century and we are concerned to ensure that the future access arrangements there do not jeopardise the ability of the site to operate as a major visitor attraction. We think that these issues are particularly acute at Wisley, and more so than say at Painshill Park, given the existing high visitor numbers, the ambition to grow these and the existing issues when major events take place.

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Summary

Historic England is committed to working with Highways England to help understand the effect of this necessary junction improvement upon the historic environment and to find ways by which to avoid, minimise or mitigate the harm that would be caused.

As work to identify a preferred option is taken forward we would be pleased to offer pre-application advice before a DCO might then be sought. For this we will need to reach agreement about what would be a charged for advisory service as the available 15 hours of free advice have by this letter all been used up. Additional information about our *Extended Pre-Application* service can be found at www.HistoricEngland.org/EAS and I would be pleased to discuss this further.

Based on the information currently available to us we have a clear preference for the option 14 design of an elongated roundabout over the option 9 design for a 4 level flyover. This is based around what we think would be a lower land take and an arrangement of new roads which would cause less harm to the scheduled monuments closest to Junction 10. We think that both options will cause some harm to these monuments through changes in their settings. There is also an as yet not understood potential for harm to undesignated archaeological remains under both options. This harm is potentially lower under option 14. We think that a raised flyover has the potential to be visible from a wider range of designated heritage assets, including potentially from within the SW end of Painshill Park (including the Gothic Tower).

To a degree harm has already been caused by the existing Junction 10 and so it will be the additional harm arising from new works that will need to be considered alongside this. The extent of the probable works to provide replacement access roads has only recently become apparent to us and we are still considering our response to these. We think that major harm could be caused to the two registered parks and gardens adjoining the A3 on either side of the junction. Options which avoid taking land from either designated heritage asset are to be preferred and if some land take is unavoidable we will want to consider the effectiveness of mitigation measures for the visual and noise effects that may result. In solving the issues for Junction 10 we think it essential that the existing operation of both historic gardens for large numbers of visitors must be safeguarded.

I hope this preliminary response covers all that we discussed on 21st February. If you or colleagues have any questions about the content of this letter we would be pleased to answer these.

Yours sincerely

[redacted]

Principal Inspector of Ancient Monuments

[redacted]

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

A.3 Letter from Historic England (10.04.17)

Historic England

[redacted]
Atkins Limited,
Epsom Gateway,
Ashley Avenue,
Epsom,
Surrey
KT18 5AL

Our ref:
PA00471451
Your ref:

Telephone
Fax

10 April 2017

Dear [redacted]

re: M25/A3 - Junction 10 - proposed improvements by Highways England

I refer to my colleague [redacted] letter to you dated 8th March and I am now able to provide some additional comments, including for the options under consideration for access roads likely to affect the registered parks and gardens (RPG) at Painshill Park and RHS Wisley. We are sorry for the delay in responding but we needed to visit both sites. This had the advantage of our being able to discuss with the operators of these their position about the overall scheme. These comments are specific to the issues of the RPGs and should be read in conjunction with those in our earlier letter, including for the scheduled monuments or their settings affected by the proposal.

I hope it will be helpful if, for each historic landscape, I set out a brief assessment of what we consider to be most significant about these designated heritage assets and then how we think the road improvement, including access road proposals, might affect this. I also attach as an annexe a brief statement about the policy context in which we will consider issues of any harm to the significance of heritage assets.

- *Significance of Painshill Park*

Painshill Park is a grade I registered Park/Garden, and considered of exceptional interest. It was created between 1738 and 1773 by owner and creator, the Hon. Charles Hamilton. The garden gradually developed along the lines of the emergent Picturesque theories expounded by William Gilpin, Sir Uvedale Price and Richard Payne Knight, the two former at least having visited the site and each in their way been impressed with the naturalistic style employed there.

The picturesque movement represented a conscious shift from the naturalistic and relatively ordered landscapes of Capability Brown to those that could be likened to paintings, incorporating the dramatic and the wild. At Painshill, we see this in the careful placement of ruined follies meant to evoke the fall of ancient Rome or of the medieval monasteries of England; but also in the wild plantings at the western edge of the garden where the gothic tower (grade II*) rises out of the pines like an abandoned fairy-tale castle.

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Historic England

The gardens were intended to be experienced as a series of events, happened upon as the visitor travelled clockwise around the park. Provoking emotion was fundamental to the experience of these eighteenth century gardens, and Hamilton would have consciously designed parts of his park to evoke a sense of melancholy, surprise or meditation as visitors moved around the site. The Elysian Fields, in the northern area are a key part of Hamilton's design and here was planted a flower garden with a background of exotic shrubs and trees where visitors would have taken rest at the Temple of Bacchus (under reconstruction) and been shown Hamilton's collection of antiquities.

The northern part of the park was originally within Hamilton's ownership and late eighteenth century maps show this area as relatively open, with just a narrow belt of trees along the old Portsmouth Road (now the A3). Illustrations contemporary with Painshill's creation show that views were available into it from the Portsmouth Road, with the Surrey heathland forming the backdrop to the garden. A sale plan of the garden dated 1831 shows the northern boundary more heavily wooded; and this part of the RPG has since changed again with fractured land ownership, domestic or equestrian activities and boundary hedges and fences abutting the more managed and publically accessible parts of the park.

- *Impact of the proposals*

The A3 is a very busy and fast road and the aural intrusion of it into Painshill is severe, particularly in northern and western parts of the park and around the gothic tower, which also suffers from the effects of the pylons detracting from its intended enchanted setting.

While the relatively thick planting along the northern boundary does not appear to be a designed element of Hamilton's landscape, and the split ownership now divorces this part of the park from the more considered parts of the garden, both clearly provide a useful buffer to the noise and visual intrusion of the A3 to the more significant parts of the park. As set out in our earlier letter, any land take into the RPG should therefore be avoided, because of the harmful effects associated with increased traffic movements.

In terms of the proposed access roads, little information has been provided on how these will actually appear or on the volume of traffic using them. While they would serve only a limited number of properties, taken together with any widening of the A3, the cumulative impact on the RPG could be considerable.

Historic England is however most concerned about proposals to locate an overbridge at the site of the gothic tower. The tower was one of the furthest points on the historic visitor circuit (as it still is) and was in many ways conceived as the final spectacle of the tour, an unexpected encounter deep within the woods. While we acknowledge the intrusion of modern development on the setting of this building, we understand that the Painshill Park Trust is continuing to explore options to re-site the nearest pylon to it and reinstate something of the mystical quality of the building's setting. We think that a raised footbridge in either location PAIN03 or PAIN04 would

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Historic England

cause a very high level of additional harm to the designated heritage asset itself, and to the RPG in the terms of the National Planning Policy Framework (NPPF). We would strongly encourage you to discount this option from consideration of the scheme.

As set out in our earlier letter, our preference is for Option 14 in respect of changes to Junction 10 itself. We would like to see Accurate Visual Representations of this scheme as it would be viewed from the Gothic Tower to understand how the proposal, with raised elements and increased lighting would appear in the wider landscape.

Please see our comments below in respect of sound mitigation measures.

- *Significance of RHS Wisley*

Wisley Garden is the oldest of the gardens of the Royal Horticultural Society (RHS) which has been operating from this site since 1903. It appears on Historic England's register of parks and gardens at grade II* and is therefore like Painshill among those landscapes registered at the highest grades. Even before the tenure of the RHS, the garden was used for experimental planting by owner George Fergusson Wilson who was inspired by plantsman William Robinson and advised by Gertrude Jekyll. The garden was gifted to the RHS in 1903 by Sir Thomas Hanbury, and the RHS has since been building on its reputation for excellence in horticulture and horticultural science at this site.

The southernmost part of the gardens nearest the A3 is the site of the trial beds, which, given the historic significance of the site are clearly a very important component of the garden. Beyond this is Battleston Hill, an area heavily planted with exotics, many sourced by famous plant hunters. There has clearly been much investment in this area to create attractive walks through the woodland, and it has a character unique from the rest of the garden.

- *Impacts on the significance of Wisley*

We advised at our initial meeting that we felt the impacts to Wisley were likely to be associated with the further noise intrusion rather than because of direct impacts. However, having visited the site and gained a better understanding of the issues, we think that the effects arising from the proposed land take and their impact on historically significant plantings in that location will be considerable. Furthermore, the threat to the operational activities of the site at a time when the Society is investing heavily in visitor facilities is real, and potentially very harmful to the long term sustainable future of the site.

Dealing first with the land take and the various access arrangements proposed, we are concerned that a two-way access route taken together with the widening of the A3 would eat into the RPG quite significantly along its southern boundary. As set out above, this area is historically significant because of the rarity of species planted in Battleston Hill, but also because of the use of this part of the garden to support trial

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Historic England

planting, which is the raison d'être of RHS Wisley. It is therefore particularly important to minimise the land take associated with the proposed works, and we would encourage you to exhaust all options to avoid this eventuality.

RHS Wisley has set out in its own representations the scale of the investment at the gardens and the importance of maintaining the operational capacity of the site to their long term business plans. Through our advisory role, we seek to ensure that heritage assets are sustained in their optimum viable use, and we fully support the aspirations of RHS Wisley to maintain and grow the visitor offer, while conserving those historic values that make it a special place.

A number of the access arrangements proposed to RHS Wisley would result in contrived and lengthy journeys up and down the A3 which may not only impact on the desirability of the site as a visitor destination, but could also result in increased traffic along this stretch of the A3 and on the new J10 roundabout. We therefore endorse RHS Wisley's suggestion to give greater consideration to providing on and off slips at the Ockham roundabout which would address some of these issues.

- *Sound mitigation at both sites*

For both RHS Wisley and Painshill Park, the increased noise resulting from these improvements should be modelled. We strongly recommend that consideration is given to sound mitigation measures such as silent road surfacing, planting and where appropriate, bunding, to diminish the aural intrusion of traffic noise on these exceptional registered landscapes.

We would welcome a continued dialogue with Highways England as the proposals develop, and trust that the above comments will assist your consideration of the various options affecting these sites.

Yours sincerely

[redacted]

Inspector of Historic Buildings and Areas

[redacted]

Copies – [redacted]

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Historic England

Policy Context for proposals affecting the Registered Parks and Gardens

The government's policies on sustainable development are set out in the National Planning Policy Framework. It strives to achieve sustainable development, seeking economic, social and environmental gains jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions (para.8 NPPF). Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment (para.9 NPPF). Proposals for development should therefore seek to avoid or minimise the harm to the significance of designated heritage assets.

Under the NPPF it is a **core planning principle** to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (para.17 NPPF). When considering the impact of a proposed development on the significance of a designated heritage asset, **great weight** should be given to the asset's conservation. No other planning concern is given a greater sense of importance in the NPPF. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, **any harm or loss should require clear and convincing justification** (para.132, NPPF).

Planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably (para.139 NPPF).

Where a proposal cannot be amended to avoid all harm, then if the proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (para.134).

Historic England's Advice Note, GPA 3, The Setting of Heritage Assets sets out a framework for identifying the significance of historic places as derived from their setting, and ways in which change can be managed to minimise harm and maximise enhancement opportunities. Importantly, it notes that setting can include the way the asset is experienced and could therefore include the effects of noise, vibrations and pollutants.

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

A.4 Meeting with Historic England and Painshill Park (30.05.17)

ATKINS

Meeting notes

Project:	M25 Junction 10/A3 Wisley Interchange Scheme		
Subject:	Meeting with Painshill Park and Historic England		
Date and time:	30 May 2017 14:00	**Meeting no:**	1
Meeting place:	Painshill Park	**Minutes by:**	[redacted]
Present:	[redacted]	**Representing:**	Painshill Park Painshill Park Historic England Historic England Historic England Atkins Atkins Atkins Atkins Atkins Atkins

[redacted] opened the meeting by providing a brief introduction to the objectives of the M25 Junction 10/A3 Wisley Interchange Scheme and the rationale behind the need to widen the A3 between Painshill and Junction 10, close local accesses and provide alternative access arrangements.

[redacted] talked through the two major options (PAIN04 AND PAIN5) for alternative local access for properties on the eastern side of the A3, both of which would have impact on the Painshill Park registered park and garden. Several alternative options for PAIN4 were also discussed by the group.

Historic England reiterated a number of concerns previously outlined in their correspondence including:

- It is difficult to assess the level of harm on the Gothic Tower with PAIN04 at this stage as more detail including, more details drawing and visualisations a required.
- The key issue at the Gothic Tower location is the setting of the asset.
- While PAIN05 requires considerably more land take, it is believed this is a less historic part of the park. However, this requires further assessment from Historic England to be able to make a judgement on this.
- Noise – The level of road noise has a detrimental impact on the Park and options to reduce this should be explored. While Historic England would prefer not to have a hard barrier at the edge of the park it is acknowledged that a balance needs to be struck between the noise baffling ability of the barrier and its aesthetics.

A site visit was conducted. The key issues considered included:

- Impact of noise from the A3 and M25 on the setting of the park and garden
- Possible visual impact of an overbridge and access road at PAIN04 on the view from and the setting of the Gothic Tower.

At the conclusion of the meeting a number of other key issues were discussed including:

Next meeting:	
Distribution:	
Date issued:	**File ref:**

NOTE TO RECIPIENTS:
These meeting notes record Atkins understanding of the meeting and intended actions arising therefrom.
Your agreement that the notes form a true record of the discussion will be assumed unless adverse comments are received in writing within five days of receipt.

Contains *sensitive* information
Meeting notes - Historic England and Painshill Park 30.05.17 FINAL

ATKINS

- [redacted] stated that further work would be required to understand the full impacts of these and potentially other options before statutory consultation and that how and when a Preferred Route Announcement is to be made is being discussed with Highways England. As a result, [redacted] highlighted Highways England's biodiversity objective and that stakeholders could make submissions to the project that would contribute towards this and other Highways England objectives (with the confines of the public purse).
- [redacted] highlighted concerns about the impact of construction on the operation of the Park
- **Atkins and Historic England** acknowledged that further survey work as required to fully assess the impacts of each option on the registered park and garden.
- [redacted] confirmed that he was happy for land surveys to be undertaken in the park.
- [redacted] suggested that Historic England would like to be able to work with Natural England, Painshill Park and RHS Garden Wisley to share information and attempt to co-ordinate views and responses on the scheme.

A.5 Meeting Notes (06.06.17)

ATKINS

Meeting notes

Project:	M25 junction 10/A3 Wisley Interchange scheme		
Subject:	Meeting with RHS Garden Wisley and Historic England		
Date and time:	6 June 2017	**Meeting no:**	
Meeting place:	RHS Garden Wisley	**Minutes by:**	[redacted]
Present:	[redacted]	**Representing:**	RHS Garden Wisley RHS Garden Wisley Historic England Historic England Atkins Atkins Atkins Atkins Atkins Atkins Atkins Highways England

[redacted] gave apologies on behalf of [redacted] who will taking over Historic England consideration of the scheme from [redacted]

[redacted] opened the meeting by thanking all parties for their time and highlighting the purpose of the meeting to gather further information about the potential impact of Wisley Lane side road options on RHS Garden Wisley, and representations from Historic England and RHS Garden Wisley in regard to this.

[redacted] provided a brief overview of the scheme development to date, and specific developments regarding the WIS-01 and WIS-010 side road options for Wisley Lane, and their impacts on RHS Garden Wisley.

Action for [redacted] – send over slide deck from this meeting to Historic England

RHS Garden Wisley re-iterated that their current position is that they have there main criteria for any charges to access on Wisley Lane:

1. No land-take from the Garden
2. Improve the approach and access to the Gardens
3. Minimal disruption to the Garden's major investment programme during the scheme construction period.

[redacted] said RHS Garden Wisley feel that WIS-010 is more deliverable in terms of the space available to construct it.

The possibility of south facing slip roads (for both north and southbound traffic) at the Ockham Park junction was raised as an issue that was discussed previously. While Sough facing slips are considered out of scope

Next meeting:	
Distribution:	
Date issued:	**File ref:**

NOTE TO RECIPIENTS:
These meeting notes record Atkins understanding of the meeting and intended actions arising therefrom.
Your agreement that the notes form a true record of the discussion will be assumed unless adverse comments are received in writing within five days of receipt.

Contains *sensitive* information
Document4

ATKINS

for the scheme, the level of public and stakeholder interest in these means that the project team are assessing the possibility of delivering these.

Historic England initial feedback

Historic England said it was helpful to see the Ockham Interchange drawing. Main concern is the conservation of what is of historic significance at the garden, and in particular, the link to botany. Trial gardens are of historic and artistic significance because of the contribution to these of people who are significant to the history of the Garden.

Historic England would like to see a full heritage impact assessment undertaken at the site.

WIS-001 potential impact

Action for [redacted] – send over slide deck from this meeting to Historic England

RHS Garden Wisley has undertaken an assessment of tree that may be at risk under the worst case scenario boundary move (where the plan would include embankment works). [redacted] to distribute electronically the list of affected trees and a location map.

To improve the overall understanding of the area, Atkins will liaise with [redacted] (RHS Garden Wisley GIS specialist) to clarify any inaccuracies in GIS data.

A.6 Email (29.11.17)

From: [redacted]
Sent: Wednesday, November 29, 2017 3:20 PM
To: [redacted]
<mailto:[redacted]
Cc: [redacted]
<mailto:[redacted]
Subject: Highways England M25 junction 10 / A3 Wisley interchange improvement scheme PRA

Dear [redacted]
As just discussed, Highways England has today announced the outcome of the Preferred Route Announcement (PRA) on the M25 junction 10 / A3 Wisley interchange improvement scheme. Option 14 (the elongated roundabout) is the preferred option. This option adds more capacity and provides dedicated free-flow left turns for all traffic and provides pedestrians, cyclists and horse riders with segregated crossings at the junction.

Whilst a majority of consultation respondents (64%) stated a preference for Option 9 (the 4-level flyover), a large number of respondents highlighted real concerns about the environmental impact it would have on the environmentally sensitive land surrounding the junction. As a result, we have undertaken further refinements to the outline design of Option 14 and it now offers both better safety and congestion performance than was presented during consultation, along with a lesser environmental impact. We believe this refined option delivers the best possible scheme, to meet everyone's needs.

The scheme also delivers the widening of the A3 between Ockham Junction and Painshill Junction from three to four lanes, which will add capacity, improve traffic flow and reduce delays. This means that direct accesses onto and off of the A3 between these junctions will be stopped up. Alternative arrangements have been made. We spoke about the Wisley Lane access and how it has less impact on the registered park and gardens and also about the option at Painshill which has been refined to reduce the impact on the gothic tower.

The Highways England website has now been updated and the announcement is live. You can access the PRA brochure here: www.highways.gov.uk/m25j10
https://urldefense.proofpoint.com/v2/url?u=http-3A__www.highways.gov.uk_m25j10&d=DwMGaQ&c=cUkzcZGZt-E3UgRE832-4A&r=Ufbcuj5-jN9INBONNh3B8R6JYAcSKQ3IivMmD1XNGRo&m=oKVerKEMBvJ7Ogng-dy5RJRNnseutS1Yf1V7JHIMfKE&s=dSx_dGYgGKBZ-GCpG_IB6EeS2kY9BAMfmzifnQIv54M&e= . The website also has all the detailed information on the consultation results, including the consultation report. A hard copy of the PRA brochure has been put into the post for you – please let me know if you would like any further copies.
As I mentioned on the phone we would like to come and meet with you to discuss the preferred route, please could you let me know your availability in December, or early January. In the meantime if you have any questions please do not hesitate in contacting me.

Kind regards,

[redacted]

[redacted]

Contains *sensitive* information

Stakeholder Engagement Team

Tel: [redacted]

Atkins – M25 junction 10/ A3 Wisley interchange improvement scheme

Working on behalf of Highways England

Highways England Customer Contact Centre

0300 123 5000

www.highways.gov.uk <https://urldefense.proofpoint.com/v2/url?u=http-3A__www.highways.gov.uk_&d=DwMFAg&c=cUkzcZGZt-E3UgRE832-4A&r=D_v7dWmlixgasD7kTdmL3FANSBfqpiU6sZO4aSbIEjw&m=dEyQfN-OSt7Q7YvFGDK1TQsVR132mEijq6RlEPv1kY8&s=vnHLwTfJiijrYLFcJ4bAZRTemFLa1BBu8wYXc9gVDrQ&e=>

Contains *sensitive* information

A.7 Meeting with Historic England (22.01.18)

ATKINS
Member of the SNC-Lavalin Group

Meeting notes

Project:	M25 J10/A3 Wisley interchange improvement scheme		
Subject:	Historic England – stakeholder update and heritage discussion		
Date and time:	22 January 2018	**Meeting no:**	Stage 3 - 001
Meeting place:	Historic England, Guildford	**Minutes by:**	[redacted]
Present:	[redacted]	**Representing:**	Historic England Historic England Highways England Highways England Atkins Atkins Atkins Atkins

ITEM	DESCRIPTION & ACTION	DEADLINE	RESPONSIBLE
1.0	[redacted] reminded the group to drive carefully in wet conditions and to be aware of your speed and visibility of pedestrians and cyclists. Equally, when travelling on foot we should be aware that we are less visible and dashing across roads to avoid the rain isn't advised.		
2.0	Scheme update and PRA – [redacted] explained the scheme as announced at PRA – option 14 and widening of the A3. She highlighted the benefits of the scheme including: extra capacity, improved traffic flow and dedicated free-flow left turns. [redacted] outlined the impacts including: environmental issues, NMU crossing points and access arrangements. [redacted] detailed the revised arrangements at Wisley Lane, Elm Corner and access at Painshill. She outlined the various options that had been looked at for the alternative arrangements at Painshill and explained why PAIN 5 and PAIN 10 had not been taken forward. [redacted] then explained the merits of PAIN 4C and the rationale in choosing this option ie. the lesser environmental impact. There was discussion on the feasibility of option PAIN 10 and the associated electricity pylon.		

Next meeting:	TBA		
Distribution:	All present plus [redacted]		
Date issued:	20/02/18	**File ref:**	

NOTE TO RECIPIENTS:
These meeting notes record Atkins understanding of the meeting and intended actions arising therefrom.
Your agreement that the notes form a true record of the discussion will be assumed unless adverse comments are received in writing within five days of receipt.

Contains *sensitive* information
180115_His Eng_minutes_FINAL 22.01.2018

ITEM	DESCRIPTION & ACTION	DEADLINE	RESPONSIBLE
	[redacted] explained that the design for option PAIN 4C was still being refined and that the designers were looking for ways to make it sympathetic to the surrounding landscape ie. planting to soften the aesthetics. There was a discussion on the location of the PAIN 4C bridge and its proximity to the gothic tower. [redacted] advised that the bridge would carry light traffic as its purpose is to provide access for a small number of properties – it would not be for through traffic. [redacted] explained that even if another option was progressed that there would still need to be a bridge in this location to provide the NMU access that is being displaced due to the free-flow left turns at the junction. She also advised that a 3D model is being worked on that will depict the 360° views from the top of the tower and that Historic England input into this would be welcomed. [redacted] informed the group that one of the Historic England concerns was that any form of development in the area could provide a green light for further development. [redacted] provided some history on the original intention of the tower and its setting. He explained the contribution of the current close up ground level setting of the tower. He explained that the core of the park was around the lake, that the tower is supposed to sit above the treeline and to view and be viewed from beyond. He explained that there were historic vistas to St Paul's Cathedral and Windsor Castle. At the moment the setting is compromised by the height of the trees, with only one view retained. He advised that the loss of some trees if that were required could help restore the original intention of the tower enhancing views of it. [redacted] reassured the group that some of the taller trees would be lost but that the trees in the foreground would be maintained retaining the gothic atmosphere in the close proximity of the tower. [redacted] provided technical cross section diagrams of the gothic tower and the A3 demonstrating that the gradient of the land means that the bridge appears at ground level from the tower ie. it is not imposing. [redacted] asked about option PAIN 10 and its proximity to the Gothic Tower and enquired into the possibility of placing the pylon and power lines underground. [redacted] explained that the possibility of placing the pylon and power lines underground was unlikely on grounds of cost and programme impact.	Late March 2018	[redacted]

Contains *sensitive* information
180115_His Eng_minutes_FINAL 22.01.2018

Plan Design Enable

ITEM	DESCRIPTION & ACTION	DEADLINE	RESPONSIBLE
	[redacted] asked for consideration to whether undergrounding of cables in this immediate location was more affordable than tackling a larger stretch of the overhead wires. [redacted] expressed that she was keen for the impact of any harm to be minimised and that and opportunities should be promoted. [redacted] advised that it could be possible to off-set any harm with enhancement to the settings of other monuments in the locale through better signage and public information. There was discussion on the public perception of the conifer trees. [redacted] advised that there will be an impact if some trees come down ie the impact of high winds on the remaining trees.		
3.0	DCO process – [redacted] advised that the project was a classified as a Nationally Significant Infrastructure Project and that as such the consents process is via the Development Consent Order (DCO). It was introduced by the Planning Act 2008 and covers a range of approvals to implement a scheme. It is a front-loaded system with specific requirements around consultation and statutory consultees. As such we would engage regularly at prescribed times to keep Historic England up to date. [redacted] stated that Historic England were happy to meet as needed going forward on both a bi-lateral and group or forum basis as appropriate. [redacted] advised that the DCO is determined by the Secretary of State for Transport, based on a recommendation from the Planning Inspectorate. She explained that it is a six-stage process and that we are currently in the first stage – pre-application. [redacted] explained that the Statement of Common Ground (SoCG) would be the next step after the consultation had concluded.		
4.0	Consultation – [redacted] explained that the Statement of Community Consultation (SoCC) will shortly be published. Statutory consultation with the public is planned to start in February and to run for six weeks. There will be public information events being held in the community and information will be available in convenient locations. [redacted] advised that due to the statutory process and needing to ensure parity of information, that during the consultation is the best time to have meaningful discussions about the project but that technical engagement is ongoing. [redacted] advised that the cost recovery agreement for the last section needed to be concluded and that given we are in a new stage of work that it made sense to begin a new agreement that would take us up to DCO application. [redacted] advised that it will		

Contains *sensitive* information
180115_His Eng_minutes_FINAL 22.01.2018

Plan Design Enable

ITEM	DESCRIPTION & ACTION	DEADLINE	RESPONSIBLE
	need to be in line with national cost recovery agreements. Historic England would advise of Stage 2 costs and provide a scope and a cost estimate for their input up to DCO application submission (Stage 3) and for the DCO (Stage 4). There was discussion on the SoCG process and whether a single or joint SoCG with Natural England could be more advantageous. It was agreed to defer any decision on this to post-consultation and [redacted] to seek DCO advice on feasibility. [redacted] encouraged joint meetings. The next meeting would include Natural England and the appropriate archaeologist input. [redacted] advised that the consultation was based on the scheme Design Fix 2 – a refined route.	March 18	[redacted]
5.0	Protection of scheduled monuments – [redacted] advised that there were opportunities to enhance heritage features as part of the common land replacement due to the A3 widening. There was discussion on the Roman Bath House and Neolithic Monuments and the possible opportunities they present ie. bringing them back to public consciousness. [redacted] recommended a joint condition survey of the Roman Bath House. [redacted] advised that he would include at least one site visit to the cost recovery agreement. [redacted] highlighted that we were ensuring best practice design and that she was keen to implement best practice construction as well, particularly with regards to the Bronze Age Barrows adjacent to the junction. This includes fencing to ensure their protection during GI and enabling works and continued throughout construction. There was also discussion around the possibility of erecting temporary barriers around the base of the monument to protect it from construction traffic. [redacted] agreed that there needed to be mitigation against construction impact. [redacted] questioned the user experience of visiting the Bell Barrow on Cockrow Hill when the project is constructed and that as the junction is now moving closer to the heritage site, are noise/ environmental barriers being considered. [redacted] stated that this would be addressed in the Environmental Assessment. [redacted] asked about the GI works and the possibility of analysis by an archaeologist for a deposit model. [redacted] agreed this could be looked into.	By May 18 Spring 2019	[redacted] [redacted]

Contains *sensitive* information
180115_His Eng_minutes_FINAL 22.01.2018

Plan Design Enable

ITEM	DESCRIPTION & ACTION	DEADLINE	RESPONSIBLE
	[redacted] asked about the scope for sound and noise barriers and [redacted] advised that there were ongoing surveys to assess noise before, during and after construction. [redacted] reassured that Highways England was looking at mitigating against any harm caused by construction. [redacted] highlighted that the joining up of the commons meant that the Barrows and Bath House were being brought back into public use.		
6.0	Painshill Park and gothic tower – SEE SECTION 2.0		
7.0	RHS Garden Wisley – [redacted] advised that the preferred option was also Historic England's preferred choice. [redacted] explained that there was a small amount of land take involved. [redacted] advised that if designated funds could be sought then the bridge would be enhanced but that in any case the scheme will improve access, increase capacity and provide a canopy level approach. He explained that the project would not be providing south facing slips at Ockham and that these would need to be part of a separate scheme and any associated impact would need to be assessed. [redacted] advised that the engagement with RHS Wisley has been encouraging.		
8.0	AOB [redacted] advised that [redacted] will be returning from maternity leave in April and will resume responsibility for the project with his oversight. [redacted] explained that the red line boundary and the associated construction compounds could have archaeological implications and was keen to discuss this further at the appropriate time [redacted] outlined the programme: Statutory consultation starting in February and DCO application in Winter 2018. He outlined the RIS optimisation and the associated three to six month delay in the start of works that would allow alignment of partner schemes such as SMART motorway. He advised though the programme was still incredibly tight to ensure delivery. [redacted] asked [redacted] to ensure that all actions from previous meetings had been resolved. [redacted] to check and feed back to [redacted] if there are any outstanding issues before start of consultation. Date of Next Meeting – Historic England are encouraged to attend a public consultation event where a meeting with the technical team can be facilitated.	Feb 18 Feb/ March 18	[redacted] [redacted]

Contains *sensitive* information
180115_His Eng_minutes_FINAL 22.01.2018

Plan Design Enable

A.8 Historic England Statutory Consultation response and PEIR (23.03.18)

Historic England

Mr [redacted]
Highways England
Bridge House
1 Walnut Tree Close
GUILDFORD
GU1 4LZ

Our ref: AA53635/1
PA00714425

Telephone [redacted]

23rd March 2018

Dear [redacted]

re: M25 JUNCTION 10/A3 WISLEY INTERCHANGE IMPROVEMENT SCHEME

Thank you for consulting Historic England about the above roads proposal under S42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. We have considered the Preliminary Environmental Information Report (PEIR) and we also met with your colleagues on 22nd January 2018 to discuss this project. This letter builds on the comments we made then.

As it is part of a statutory stage of the process of making a DCO application our engagement with this consultation is not subject to charging. As you develop the detail of the proposal and carry out production of an Environmental Statement we expect to provide pre-application advice and to meet with the project team to do so. Such pre- DCO application engagement will be subject to cost recovery by Historic England and to this end we have agreed a cost estimate under our Extended Pre-Application service (see www.HistoricEngland.org.uk/EAS).

As a general observation we think that the PEIR is mostly a description of the baseline heritage data and a statement of the methodology that will be followed under Environmental Impact Assessment (EIA) to produce the Environmental Statement. Where it includes an assessment of the construction and operational effects of the proposal upon heritage assets (Chapter 11 of the main PEIR text) this is summarised as tables 11.1 and 11.2. Our views about the individual designated heritage assets are provided below, concentrating on those listed grade I or II* or scheduled as ancient monuments. Others will comment on other heritage assets, notably the local authority conservation officers for grade II assets and Surrey County Council archaeologists for undesignated archaeological remains.

We note the assessment of effects made in tables 11.1 and 11.2 but without more information and discussion of the details, including the means by which effects on the historic environment will be investigated and considered, we are not yet in a position

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

to agree that these assessments are correct or that they should be carried through unaltered to the Environmental Statement.

We also note that in categorisation of listed buildings in the tables used – for example Table G1 in the Appendix volume 2 – this puts grade II listed buildings as" medium" value alongside designated and undesignated heritage assets of regional importance. This is not helpful as the degree of legal protection for a listed building is no different between the grades therefore all listed buildings should start from the base of high value, as being nationally designated. If a distinction is needed between grade II and grades II* and I, then the latter could be elevated to very high value.

We think that the assessments carried out to date place too little weight on group or cumulative values. In the tables the grade II listed buildings within the grade I registered Painshill Park are categorised as medium but the park itself is assigned high sensitivity. The significance of groups of heritage assets as a whole should be better articulated.

When considering issues of setting we think that too much emphasis is placed on views to and from heritage assets and thus too little attention is paid to other ways in which a place can be experienced. This is fully described in our Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets (https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/) which includes a methodology that we recommend following. Issues such as noise also require consideration.

Our detailed comments for the individual heritage assets for which we are most responsible for advice are set out below.

Royal Horticultural Society Wisley – grade II* registered historic landscape.

The construction effects are assessed as *moderate adverse* and the operational effects also as *moderate adverse* (based on effects on setting and some direct works within the asset).

We note the decision to locate local distributor roads east of the A3 and thus to avoid a significant land take along the eastern boundary of the asset. There is some new construction within the site at the NE corner where the existing footbridge will be rebuilt as a road bridge. Detailed design information for these works is not yet provided and we will want to consider this before we can agree what the effect on the significance of the heritage asset will be. We note that a statement of significance has been prepared for the site and we look forward to being able to consider this. It should be compared with the Society's own Statement of Significance. We will wish to know more about any signage (including gantries) and lighting on the A3 and whether these are visible from within the registered landscape.

We note that the noise assessment data and proposals for future assessment (chapter 6) are focussed on residential properties as potential receptors. The experience of people at the heritage asset, be these visitors or staff employed there, is part of how its significance is appreciated. We will wish to understand how noise levels will be affected by the proposals and we suggest that data should be obtained for the designated heritage asset. The aim should be to achieve an improvement over the existing situation and certainly not to make matters any worse. We will be

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

interested in how quiet road surfaces and acoustic barriers might lessen noise and how proposed works might change the character of the existing interface between the A3 and the heritage asset.

We note that the new entrance into RHS Wisley is proposed to remain outside of the registered part of their site. We have raised a concern that the visitor operation of the heritage asset, including the ambitious lottery funded proposals there, should not be adversely affected by the revised access proposals, on and off the A3. We have seen the concerns that have been raised by RHS Wisley, including the alternative road connections that they are promoting. We would like to know more from you as to whether these alternative proposals are compliant with highway design and operation standards and, if so, why you consider that the Preferred Route Announcement design is preferable. We think it is legitimate to consider how different access options to RHS Wisley are likely to impact upon visitor numbers and this is a historic environment concern as the sustainable operation of the heritage asset is based on its success, now and in future, as a visitor attraction. The traffic model for future movements under your proposals will need to demonstrate what the effects on the operation of Wisley are and that these have been minimised i.e. no better overall alternative solution exists.

In addition to the effect of the side road proposals upon RHS Wisley itself, we wish to be satisfied that traffic movements will not have an adverse impact upon nearby settlements where these are conservation areas, contain listed buildings or both. For example Ripley is a conservation area and although it has origins as a settlement on the old A3 we will be interested as to whether through traffic there will be increased and what the effect on historic environment significance might then be.

Scheduled barrows close to J10. – chiefly scheduled bell barrow.

The construction effect on the bell barrow is assessed as *moderate adverse* and the operational effect as *large adverse*, based on the effects on its setting and a new road closer to the asset itself. The effect on the bowl barrow from construction is described as *slight adverse* and is not described for operational effects, presumably as these are considered to be negligible.

We have now inspected both monuments and the bell barrow is a very impressive example of its type. The Surrey Wildlife Trust has been keeping the barrow clear of vegetation and taking steps to discourage harmful activity such as biking. This barrow is not directly impacted by the proposals but parts of the enlarged J10 would be closer to it and this raises issues for its setting, both visually and for noise. There is very clear noise intrusion at present and we suggest that baseline noise data at the designated heritage asset should be obtained now so that the effects of the proposed changes can be demonstrated. The aim should be to reduce harm from such issues. Between the barrow and the existing road are undulating mounds with some tree cover. The preliminary design (landscaping plan - fig 9.8 sheet 3/10) shows new tree cover along this edge and this could be an appropriate way of dealing with this boundary, perhaps by first understanding and then enhancing the earthworks that are now present. Vehicles are visible from the barrow, but more as glimpses through the trees, and we think that any proposal for a fence or solid boundary/noise screen could be intrusive and might increase harm by blocking the wider views from and of the context of the barrow. Low bunding and tree planting could be most effective.

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Solutions as to how best to limit harm to the significance of the scheduled barrow will need to be based on an enhanced understanding of the potential for other archaeological remains in its surrounds, be these visible as earthworks or buried. We understand that walk-over surveys and use of LIDAR data has taken place and we would be pleased to see reporting of this, probably as a desk-based report. We think that some intrusive investigations may be needed in order to evaluate the archaeological potential of the land in which new road construction or mitigation measures will take place. We would be pleased to discuss the probable need for trial trenching and the timing of this i.e. before or after a DCO application. The aim should be to understand the potential for nationally important but undesignated archaeological remains associated with the barrow site since the presumption should be that such evidence is preserved in situ. Investigation to provide a record of significance would be a less good outcome.

We agree that the other scheduled bowl barrow will be much less affected by the proposals than the barrow discussed above. It does not survive as such a clear mound and its condition is not as good. There are other visible earthworks around it and the nature of these and any interrelationship of these and between the two scheduled monuments should now be clarified. The bowl barrow would be less affected by the proposals, but bringing the road closer could erode some of its wider setting. As mitigation for any harm to be caused to both scheduled monuments it would be sensible to agree and implement improved management of the barrows as a pair. This would be a heritage benefit which could include the research potential in better understanding the significance of the archaeological remains and interpreting this to visitors who will still have access to the land after completion of the road improvements.

Roman bath house at Chatley Farm and Red Hill hengiform monument (both scheduled)

The effect of construction on the hengiform monument is assessed as *moderate adverse* and the operational effects as *slight adverse*. For the Roman site the construction effect is assessed as *slight adverse* and the operational component as *slight*. The effects arise mainly from changes in setting but there is potential for undesignated archaeological remains. The condition of the bath house monument requires improvement.

We have attempted to visit these scheduled monuments but from publicly accessible land we have not been able to gain a full understanding of their present character and condition. We therefore suggest that a joint inspection with your heritage consultants should be arranged, via the landowner, at an early stage of the EIA process. In particular we are concerned for the future of the Roman bath house which is included on our Register of Heritage at Risk as being in a declining condition. It is not clear to us what kind of wider site in the Roman period this was the bathing facilities for. Bath houses are most often indicative of a nearby villa but they are also sometimes found as part of some industrial sites. Our concerns would be for the potential of works to cause harm to any as yet unrecognised but potentially nationally important archaeological remains and for the setting of the scheduled bathhouse.

The current preliminary design (fig 9.8 sheet 3/10) shows that areas immediately south of the Roman site would be planted with interspersed woodland glades with

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

only some grassland between and that this would be as part of enhanced public access land . This could be detrimental to the current setting of the bathhouse by; creating a more enclosed landscape under which it would be more difficult to appreciate its unique location in the landscape adjacent to the river. Although there is no public access at present the monument is part of a well-established and generally well-managed agricultural landscape. Any change to this landscape character will require careful consideration and for land affected by mitigation proposals for non-historic environment reasons (such as public access or habitat recreation) its archaeological potential will need to be demonstrated. Work to do this should first consider LIDAR data and geophysical survey techniques but we do not rule out the potential need for trial trenching to address these issues. Similar, but perhaps less high, concerns exist for the hengiform monument as for the bathhouse. Both are scheduled monuments and a heritage benefit to mitigate harm would be to improve the management of these (and therefore their risk status) and to learn more about their significance through research into their contexts.

Painshill Park grade I registered historic landscape, incorporating listed buildings and chiefly the Gothic Tower (grade II*).

The effect on the Painshill Park registered landscape as a whole is assessed as *moderate adverse* for both construction and operational phases. Those for the Gothic Tower are also assessed as *moderate adverse*. The proposal requires some land forming part of the registered landscape and an over bridge is proposed close to the II* tower.

We think that of all the proposed road improvements those at Painshill Park are potentially the most harmful to the historic environment. This is a designated heritage asset of the highest significance. We do not accept the above assessment of the levels of harm and we wish to understand more about the detail of the proposals, including whether less harmful solutions are possible.

The existing A3 is harmful to the experience of the registered landscape, both through its noise and visually. How the picturesque landscape was first conceived and hence how it was intended to be experienced is important. This includes the core sequence of individually listed heritage assets around the lake which we think is not highly affected but also the northern boundary which is more relevant to the proposals. We would like to see the Statements of Significance prepared for the historic landscape as a whole and also that specific for the Gothic Tower to understand how the contribution of the existing landscape character and the setting around the tower to historic significance has been assessed.

For the tower we understand that an emphasis is being made for the long distance views that were once obtainable from it but we also consider that the immediate surrounds of the II* listed building are important as it served as a destination for visitors to the park as part of carefully considered routes. We have a strong concern for the setting of the Gothic Tower (II*) under the proposed new over bridge adjacent to it and we want to start discussion of the detailed design for this so that we might come to a view about the level of harm that this would cause. We need as part of this to understand why less harmful solutions, such as a crossing at the San Domenico site have not been adopted. The setting of the tower is at present badly marred by the proximity of electricity pylons and one way to mitigate other harm to be caused to the heritage assets would be to address this harm. We acknowledge that

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

undergrounding of power supplies is an expensive task but even a short length of this nearest the tower would be beneficial. We will wish to discuss what the project might be able to deliver including by making use of other environmental improvement funds.

For the northern boundary of the registered landscape we can acknowledge that this has seen significant change from its 18th century character when the A3 formed the old London to Portsmouth road. More recent changes in this part of the heritage asset may have degraded its significance and this includes its fragmentation in ownership. It nevertheless is part of the historic landscape and we want to understand both how much land would need to be taken from the heritage asset and how a new boundary would be formed with the remaining historic park. The contribution that the land currently makes to the significance of the designated heritage asset needs to be understood and this includes important structures close to this northern boundary. The Turkish Tent and the Temple of Bacchus are not designated heritage assets as they are recent recreations of lost features but these are nevertheless contributors to the significance of the landscape and locations designed for a specific visitor experience, both in the past and at present. We think that the A3 causes harm primarily by virtue of it being part of the setting of the landscape and this relates both to visual and noise factors.

We will wish to understand the detailed design of a new northern boundary of the park with the widened A3 and/or new access roads. This should include the loss of any trees to road widening and any consequent replacement tree planting to provide screening. Tree removal could threaten the future of other existing trees by changing their environment and with this any vulnerability to wind damage. If any acoustic barriers are proposed we will wish to see details of their design. We think that noise is a significant issue for the park and we think that baseline data should be obtained for the heritage asset now so that future effects can be demonstrated. The aim should be that existing noise levels are reduced, including by mitigation measures such as quiet road surfaces. The sustainable operation of Painshill Park is based on it being an attraction which visitors can experience as close to the 18th century intentions as possible. This requires 21st century intrusions to be minimised. Noise is however also a factor as to how the site can earn essential income from filming opportunities. It is vital that the successful operation of Painshill Park is not undermined by these road proposals. It is acknowledged that the ability to access the site without long queues is also a part of this.

For the record we can confirm our understanding that the II* Painshill Park House and its associated grade II buildings do not appear to be harmed by the proposals.

SUMMARY

We look forward to continuing our engagement with this significant proposed road improvement, including through our Enhanced Advisory Services. We want to understand more about the detail of the proposals so that we might assist you to fully assess the effect of these on the significance of heritage assets and thus to avoid or at least minimise any harm. Whilst we have outstanding questions about RHS Wisley and the various scheduled monuments our major concern is for Painshill Park, and specifically the Gothic Tower. We want to understand how the experience of the rural idyllic landscape, as first created by Hamilton and later rescued through the huge efforts of the Painshill Park Trust and its partners, will be affected.

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Once you have been able to assimilate all of the responses to the S42 consultation we would be pleased to set up a programme of future meetings or site inspections to help you to take forward the EIA process. If you have any immediate questions then do please contact me.

Yours sincerely

[redacted]

Principal Inspector of Ancient Monuments

[redacted]

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

A.9 Meeting with Historic England (17.10.18)

SNC·LAVALIN

Meeting Notes

Project:	M25 Junction 10/Wisley Interchange M25 Junction 10/Wisley Interchange		
Subject:	Historic England meeting notes – 17.10.18 Historic England meeting notes – 17.10.18		
Meeting place:	Historic England, Eastgate Court, 195-205 High Street, Guildford, GU1 3EHHistoric England, Eastgate Court, 195-205 High Street, Guildford, GU1 3EH	Meeting no:	
Date and time:	12 November 2018 at 17:1712 November 2018 at 17:17	Minutes by:	[redacted]
Present:	[redacted]	Representing:	Historic England Historic England Historic England CJ Associates Atkins Atkins AtkinsHistoric England Historic England Historic England CJ Associates Atkins Atkins Atkins

1 and 2) [redacted] advised that the Historic England Guildford office is closing in April 2019 and moving to the Canon Street offices, located above Canon Street Station.

There was a discussion on Statements of Common Ground (SoCG). [redacted] ran over the timeline of engagement leading up to the Development Consent Order (DCO) submission (scheduled for January/February 2019).

ACTION: [redacted] and [redacted] to discuss how to take the SoCG forward.

[redacted] provided an update on the work that has been undertaken on the J10 scheme. Design changes have been made based on stakeholder feedback from the statutory consultation, resulting in some small alterations:

- Work is being undertaken looking at developing Cockcrow Bridge as a green bridge

NOTE TO RECIPIENTS:
These meeting notes record SNC-Lavalin understanding of the meeting and intended actions arising therefrom.
Your agreement that the notes form a true record of the discussion will be assumed unless adverse comments are received in writing within five days of receipt.

181017 historic england meeting notes - final.docx 1

SNC·LAVALIN

- The J10 roundabout is still roughly the same form but the elongation on the west side has been reduced
- A new Non-Motorised User (NMU) bridge now crosses over the west side of the junction
- Less widening is required on the M25 which means the bridges at Hatchford and Buxton Wood do not need to be replaced

In the DF2 scheme there was a local access road serving the Painshill properties running alongside and to the west of the A3 then crossing it to join Redhill Road. This route from Court Close Farm up to and including the bridge will no longer serve vehicles but will be made smaller and accommodate NMUs. With this change and the inclusion of a local retaining wall (which will reduce the amount of land required for the scheme) there will be a reduction on the impacts to the Gothic Tower. The A3 will still be widened. Painshill Park recently confirmed that they were happier with these changes. There was a discussion on the impacts to the Painshill Park boundary. This local access road will now join the A3 southbound slip road at the Painshill junction

- A cost reduction exercise was also undertaken.

[redacted] described the replacement land, enhancements and mitigation measures that will be undertaken. There are three types land that are being looked at for areas that have been lost:

- SPA Compensation Land
- SPA Enhancement Areas
- Replacement Land (for areas of common land/public open space lost)

These works will contribute to the aim of returning the landscape to its original heathland character.

[redacted] explained that the Outline Construction Environmental Management Plan (which forms part of the DCO) will include archaeological surveys and investigations which will be completed in the next stages of the project.

[redacted] provided information on Highways England's Designated Funds which have been set up for environmental enhancements that might not normally be included in a scheme and which might be available for work at J10. [redacted] referred to applications that could be made for Painshill Park. The Bronze Age barrows to the south west of J10 were also highlighted as potential subjects for Designated Funds.

ACTION: Atkins to share the detailed design drawings with Historic England.

03) Cockcrow Hill scheduled monuments

[redacted] explained that noise barriers will be located along the M25 and along the A3 to the overbridges. Historic England is interested in seeing what that fencing looks like.

[redacted] explained that Atkins is looking at how to minimise noise impacts and the scheme now includes low noise surface on all of the A3 lanes

[redacted] highlighted archaeological remains around the east of Painshill Park and raised concern about the planting of trees - the changes here are welcome but Historic England is still interested in looking at results from the archaeological surveys in this area.

[redacted] confirmed that no trees will be planted in the area around the Scheduled Roman bathhouse.

[redacted] discussed the geophysical surveys that will be undertaken. It has not been decided what the level of archaeological investigations will be but this will be discussed with the council archaeological officers. Ground investigations (GI) are being looked at to determine what kind of archaeological work will be required. Some of these GIs will be boreholes.

04) Painshill Park Statement of Significance

As part of the Environmental Statement a Statement of Significance for Painshill Park has been undertaken which includes a list of the affected buildings. This does not include all Grade 2 listed buildings as some of them are too far away for impacts to be felt. It was confirmed that the Turkish Tent and Temple of Bacchus will be included. [redacted] highlighted the importance of the visitor experience.

SNC·LAVALIN

ACTION: Atkins to share the Statement of Significance with Historic England.

There was a discussion on the impacts on the Gothic Tower. The tower was originally built to give visitors a wide view of the surrounding landscape but the trees now diminish this. However, the trees do provide some visual screening for the tower from the A3. At ground level the setting was more constrained and made sombre by the trees. Noise modelling on the revised scheme is currently being undertaken but previous modelling suggested that the scheme would not lead to a noticeable change in noise levels at the Tower

[redacted] explained that Painshill House and the monuments around the lake are not affected noticeably by the scheme.

With the access route now only accessible for NMUs there is expected to be slight adverse effects on the Tower with the scheme. There might be some short-term construction impacts, but these are expected to be short term. Work is currently being undertaken to assess and report the permanent impacts.

[redacted] queried the potential for enhancements, particularly around the Gothic Tower. [redacted] highlighted issues around cost and impacts on utilities. A pylon next to the Gothic Tower and the possibility of relocating this was discussed.

[redacted] asked about what the NMU bridge will look like. [redacted] explained that it will be a single bow-span, low deck structure. The construction depth will be small, meaning that it will be lower down in the landscape thus reducing the impacts. [redacted] said that with these changes and reduction in impacts Historic England might not request a photo montage.

ACTION: Atkins to share copies of the bridge design.

05) Gothic Tower and Painshill Registered Park and Garden

It was confirmed that there will be a small amount of land-take at Painshill Park. There had been concern that this land take could have a significant effect. It is believed that due to the revisions to the scheme the impacts on the park will not be at a significant level, and would result in less than substantial harm.

[redacted] explained that the land-take would not have a significant impact on the park due to the screening from the trees that would now be largely retained. [redacted] said that he would be surprised if this came up as a major issue but that it should be recorded in the SoCG.

06) [redacted] confirmed that the scheme at RHS Wisley had also been amended to limit impacts on the garden and maintain access.

07) [redacted] confirmed that no listed building additional consents would be required if there were no physical effects on them.

Next meeting:	TBC	
Distribution:		
Date issued:	15 November 2018	File Ref:

A.10 Historic England Targeted Consultation response (14.12.18)

Historic England

Highways England
M25 junction 10/A3 Wisley interchange

Our ref:
Your ref:

BY EMAIL ONLY

Telephone [redacted]

14 December 2018

Dear Sirs,

re: M25 Junction 10/A3 Wisley interchange improvement scheme pre-application consultation.

Thank you for inviting us to respond to the additional targeted non-statutory consultation about changes to the M25 Junction 10/A3 Wisley Interchange improvement scheme, which we received on the 13th November.

I am pleased to provide our further comments and these should be read alongside our earlier letter of 23rd March 2018 (which I attach for ease of reference). You will be aware that our involvement with this project is chiefly based around three groups of designated heritage assets –

- The registered historic park and garden at RHS Wisley
- The scheduled monuments located close to the existing Junction 10
- The registered historic park and garden at Painshill Park and the individually listed buildings which it contains.

Of the above we think it is Painshill Park that would be most affected by the proposals and so we will focus most of our additional comments upon this site. Our thoughts for the other designated heritage assets are however as follows.

RHS Wisley

The proposals involve construction within the northeast corner of the site where an existing footbridge would be replaced by a road bridge. Detailed designs of this bridge should consider the grade II* registered garden to mitigate any detrimental impact. We note that the non-statutory consultation has reverted to the existing access arrangement to the Garden. We are content with this providing it supports the sustainable operation of the heritage asset now and in the future, including for its role as a major visitor attraction.

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Historic England

The proposals show overhead gantries and associated lighting either side of the proposed new Wisley Lane Bridge. For these elements to be considered acceptable it should be demonstrated that they are not be visible from within the registered landscape.

We welcome the proposal to resurface the A3 with a low noise surface. This should make a positive contribution to the noise experienced within RHS Wisley, which is currently a significant issue. It would be helpful to understand better the noise improvement provided by this change in road surfacing and also whether acoustic barriers and or planting might improve this further.

Scheduled monuments in close proximity to Junction 10

We note the changes made in the proposal now consulted upon and we do not think that these substantially change the advice that we have previously provided. As the scheme design is now finalised we will be pleased to look with you for opportunities to enhance the setting of the prehistoric barrows close to the existing junction, including by measures to provide visual and aural screening of the enhanced junction.

We repeat our advice that the scheduled monuments are unlikely to represent the totality of the archaeological resource that will be affected by the proposal and that non-designated archaeological heritage assets should be anticipated. This would include in areas not directly affected for road infrastructure but needed for habitat creation/enhancement or forming temporary construction compounds. We will be pleased to continue to offer advice about how to assess such impacts and to decide an appropriate response which we think is likely to be based upon archaeological investigation to mitigate harm. We do not however want to double handle such issues where the archaeological team at Surrey CC is already providing advice. We would be pleased to be asked for any advice by you or them, especially should nationally important but non-designated archaeological remains be identified.

Painshill Park

In our earlier response we highlighted the effects of the proposed road improvements upon this grade I registered landscape with its numerous listed buildings as potentially being the most harmful element of the junction 10 scheme in historic environment terms . Our concern focussed on the potential noise and visual impact on the grade I registered picturesque landscape and the grade II* listed Gothic Tower. With the then proposals to the northern boundary of the registered landscape involving land take, new boundary creation and a new vehicular road bridge.

We did not accept your then conclusion that the proposed construction and operational phases of the scheme would have only a moderate adverse impact on the designated assets and we requested that less harmful solutions be considered. We are thus very pleased to see that significant changes have been made in the proposal now consulted upon which would in our opinion go a long way to addressing our previous concerns. We have been in contact with the Painshill Park Trust and we

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Historic England

note that they share our view that the revised design represents a more acceptable solution.

The latest consultation proposals re-routes the local access roads to the northern boundary of the registered landscape to make more use of the existing arrangements and we think this has the potential to cause a much lower level of harm to the heritage asset. Specifically at the Gothic Tower, the proposed Redhill Bridge is no longer to provide vehicle access, being changed to an NMU only bridge of a smaller size. This results in less harm arising from changes in the immediate setting of the II* listed tower. Although there will still be some other changes along the northern boundary of the historic landscape we think that these will cause less harm to an area which has already been damaged by the existing A3 and other uses of the land.

Whilst harm has been reduced by the proposed changes it has not been wholly eliminated. We accept that some level of harm is almost certainly unavoidable and your goal should be to ensure that this is minimised by the detailed design. In designing the bridge as now proposed, thought should be given to its physical and visual proximity to the Gothic Tower and the wider registered landscape, with the design endeavouring to be unobtrusive and sympathetic to its context. With this in mind we would welcome the opportunity to also understand the detailed design of the overhead gantries and their associated lighting which are proposed for either side of the Gothic Tower on the A3.

We welcome the proposal to resurface the A3 with a low noise surface. This should make a positive contribution to the noise experienced within Painshill, which is currently a significant issue. Additionally we note the proposal to introduce noise barriers around junction 10, but note that they appear to stop west of the new bridge. Has the possibility of extending these barriers along the boundary of the registered landscape stretch of the A3 been explored and is it understood what impact they may have, both visually and audibly. Noise is a factor which impacts the visitor experience at Painshill Park and influences the ability of the Trust responsible for the site to earn essential income from filming opportunities. We think your goal should be to improve upon the existing noise levels and certainly not to make a poor situation any worse.

It is also vital that for the successful operation of Painshill Park that this is not undermined by the currently proposed road improvements. We think that the ability for visitors to access the site without long queues is important and the proposal must safeguard this. We acknowledge that for non-visitor access to the site it is appropriate for this to be provided close to the historic access point off the A3 and its gate lodges.

We fully accept that Highways England and its predecessors were in no way responsible for the egregious harm to some views of the Gothic Tower and to the wider historic landscape caused by the current siting of the electricity pylons. We understand why such a significant cost item as undergrounding of a length of such major infrastructure cannot easily be made a part of your project. Nevertheless we encourage you to stay open to how you might play a part in finding a solution to this harm. A package of funds are likely to be needed to meet the cost of undergrounding

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Historic England

and we hope that some of your separate funds (Environment Fund) for addressing harm to heritage assets caused by the road network might be accessed in future. This would be a further way in which the unavoidable harm to the setting of the Gothic Tower arising from even a reduced size of pedestrian bridge might be offset by improvements to another (and historically more significant) view of the tower.

I trust that these additional comments are helpful as you finalise your scheme design and with this your assessment of its environmental effects and mitigation proposals as part of a DCO application. We remain available to continue to provide pre-application advice and if this can include a Statement of Common Ground (SOCG) for matters about which can now be agreed this should facilitate the next stages of the approvals process.

If you have any questions do please get back to me or my team.

Yours sincerely

[redacted]

Principal Inspector of Ancient Monuments
Development Management – Surrey, Sussex and Kent.

[redacted]

Copies – [redacted]

Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

Contains *sensitive* information

A.11 Meeting with (18.12.18)

SNC·LAVALIN

Meeting Notes

Project:	M25 J10 / Wisley Interchange Scheme		
Subject:	Historic England meeting notes – 18.12.18		
Meeting place:	Telephone meeting	Meeting no:	
Date and time:	18.12.18, 14.00	Minutes by:	[redacted]
Present:	[redacted]	Representing:	Historic England Atkins CJ Associates (for Atkins)

ITEM	DESCRIPTION	RESPONSIBLE
1.	**Welcome and introductions**	All
2.	**Health and safety moment**	All
3.	**Statement of Common Ground aims and objectives** [redacted] talked through the aims for the Statement of Common Ground (SoCG) and what we hope to achieve and when.	[redacted]
4.	**Timeline** [redacted] confirmed that the Development Consent Order submission is planned in early 2019 so over the next few months it is hoped that the issues and concerns identified will be resolved or marked as 'disagreed' prior to this.	[redacted]
5.	**Historic England governance** Historic England can operate under delegated authority for the majority of this and would only need to escalate something if there is a sticking point, but it looks like this is unlikely. Historic England might need advice from external advisory committee which meets bimonthly. The other thing that might have an impact on the timeline is that a legal advisor might need to be involved at the point of signing. [redacted] will need to send emerging drafts and this might need to be built into the timeline at the end of the process. [redacted] said that he would likely sign it off if it is not escalated, subject to advice from legal.	[redacted]
6.	**Historic England SoCG experience** [redacted] confirmed that he has been involved with SoCGs before.	[redacted]

NOTE TO RECIPIENTS:
These meeting notes record SNC-Lavalin understanding of the meeting and intended actions arising therefrom. Your agreement that the notes form a true record of the discussion will be assumed unless adverse comments are received in writing within five days of receipt.

historic england meeting notes - 18.12.18.docx 1

SNC·LAVALIN

ITEM	DESCRIPTION	RESPONSIBLE
7.	**Key Historic England issues** Painshill Park – there are some outstanding concerns. J10 roundabout and impacts on scheduled monuments including non-designated archaeology associated with barrow and RHS Wisley – the degree of effect is more minor than at Painshill Park. [redacted] explained that the scheme has evolved from the earlier consultation to Design Frame 3. Subsequently, the Scheme is now more detailed. From the Targeted Consultation there will be minor changes to the Scheme – it is hoped that these will be resolved in January. These can be shared with Historic England. [redacted] asked to see the heritage chapter in the appendices of the Environmental Statement (ES) which will help to shape the SoCG. Historic England is happy to review the works in progress. Historic England confirmed that the Statement of Significance was good, but it did not include details on the way the proposal does or does not harm something of significance but this will come out of the chapter in the ES. [redacted] explained that Atkins is currently submitting the ES to Highways England for review. [redacted] suggested extending the invitation to Surrey County Council archaeological team. Historic England wants more information on the reduced impacts near the Gothic Tower from the bridge.	[redacted]
8.	**AOB** There was a discussion about the possibility of a photo montage. If Historic England would like one then this can possibly be undertaken. [redacted] said that the view from the top of the tower looking down is of interest.	All

A.12 Emails (08.04.19; 09.04.19)

We are the public body that helps people care for, enjoy and celebrate England's spectacular historic environment, from beaches and battlefields to parks and pie shops.
Follow us: Facebook | Twitter | Instagram Sign up to our newsletter

From: [redacted]
Sent: 09 April 2019 12:02
To: [redacted]
Cc: [redacted]
Subject: RE: M25 J10 Draft Environmental Statement: Cultural Heritage Chapter 11

Dear [redacted]

Further to the below, please find attached copy of the draft Statement of Common Ground for your review. Please note this version does not include the appendices (meeting notes etc).

I will forward an agenda for our meeting with you on the 17 April by the end of the week.

Kind regards
[redacted]

From: [redacted]
Sent: 08 April 2019 12:47
To: [redacted]
Cc: [redacted]
[redacted]
Subject: M25 J10 Draft Environmental Statement: Cultural Heritage Chapter 11

Dear [redacted]

In advance of our meeting with you on the 17 April, please find attached a copy of the draft ES chapter for Cultural Heritage, for your information.

I anticipate sending you the draft SoCG by this Wednesday, but will get back to you to confirm.

Kind regards
[redacted]

[redacted]
Stakeholder Engagement Team

Tel: [redacted]
DD: [redacted]

Please note my working days are Tuesday to Thursday

Atkins – South East Roads Investment Programme

Working on behalf of Highways England

Highways England Customer Contact Centre

Contains *sensitive* information

A.13 Meeting with Historic England (17.04.19)

Meeting Notes

Project:	M25-J10/A3 Wisley Interchange Scheme		
Subject:	Project update (Programme; Draft DCO requirements; Statement of Common Ground)		
Author:	[redacted]		
Date:	17/04/2019 2.00-4.00pm	Project No.:	<project no>
Attendance	[redacted]	Representing:	Historic England Historic England Highways England Atkins Atkins Atkins

ITEM	DESCRIPTION	RESPONSIBLE
1.	**Welcome and introductions** [redacted] welcomed all to the meeting and introductions were given.	
2.	**Project and Programme update** [redacted] gave an update on the project, highlighting the statutory consultation which took place February/March 2018 and changes to elements of the scheme that were re-designed during April to August as a result of feedback received. Review of design particularly in relation to impacts on Painshill Park and the Gothic Tower. [redacted] added that the changes to the design were moderate and as such a further targeted non-statutory consultation took place in Nov/December 2018. As a result, further revisions to the design were incorporated in March this year and Highways England are currently out for a further round of consultation. [redacted] noted that this has put back the timing of the DCO submission. [redacted] referred to Balfour Beatty as being the appointed Regional Delivery Partners for M25 J10 and that work at present is at package as opposed to scheme level. Preparation works by Balfour Beatty leading up to construction will take place alongside the DCO process (Stage 4). [redacted] confirmed that Atkins are the technical consultants that will take forward detailed design, as part of the Balfour Beatty team. Construction preparation will take approximately 4-5 months following DCO. In terms of land to be acquired for the scheme, replacement land acquisition and site compounds will be prioritised. Construction is due to start March 2021 for 2.5 years. [redacted] referred to ground investigation (GI) works which are due to commence after Easter. Osborne are the appointed contractors. [redacted] highlighted that there are a significant number of bore holes or trial pits – over 700 features. Information gathered will feed into the design and planning – some aspects of GI may be required during examination, for example in relation to works at Bolder Mere.	

Contains *sensitive* information

	[redacted] referred to the Smart Motorway Programme (SMP), another scheme to turn J10 and 16 into a smart motorway. M25 J10 project will be undertaking the works on J10 on behalf of SMP to keep it in one package. [redacted] referred to RHS Wisley/Painshill Park meeting taking place on the 18 April. [redacted] asked if we anticipate a separate Statement of Common Ground (SoCG) with each of these two bodies. [redacted] confirmed that yes we will. [redacted] confirmed that at point of submission we hope to have a SoCG with all three statutory environmental bodies. [redacted] referred to advanced works/statutory diversions. He confirmed that Balfour Beatty will aim to start work on diverting services ahead of the DCO. [redacted] asked – regarding advanced works and GI to take place ahead of DCO and how the archaeological implications of this would be dealt with. [redacted] stated that the project has made recommendations for various works, for example micro siting boreholes where necessary. She added that we've included in the GI contracts the requirement for archaeological monitoring and review and also made recommendations re doing minimal work around the scheduled monument, having archaeologist present under a watching brief and to do the least invasive of the GI works in these areas. [redacted] stated that Historic England would be interested to avoid an inadvertent transgression which can happen – [redacted] I do have version of the GI that we plotted on our GIS around the monuments and they're close to the A3. Hopefully it will be 30 cm directional coring so that the impact is minimal. [redacted] will do review on information received. [redacted] added that if the services diversions take place as a part of advanced works this could be more significant. [redacted] stated that these works will not be happening for at least a year. [redacted] emphasised that they are keen to ensure that any archaeological implications of these works are addressed as they would be under the DCO. [redacted] stated that if these works are brought forward in advance of the DCO we would want to make sure that archaeological mitigation was implemented. [redacted] referred to the regular monthly meetings schedule with Historic England (HiE) as a means of keeping HiE informed about developments in the programme amongst other matters.	
3.	**Draft DCO Requirements** [redacted] acknowledge receipt of these and confirmed that they seemed relatively standard. [redacted] confirmed that their inspector for monuments will need to review. [redacted] stated that number 5 refers to what happens when there is an unexpected discovery as part of the works. [redacted] confirmed that the standard reaction in this instance would be for the county archaeologist to be the first point of contact which is correct. [redacted] added that there is a clear role for HiE if what has been discovered is potentially of national significance as opposed to local or regional significance. This role is to firstly to determine the significance of the finding and secondly to then decide what is the appropriate response. [redacted] stated that in terms of finds	

Contains *sensitive* information

	made in the course of construction, appropriate level of recording and analysis would need to be determined and appropriate action determined given that the scheme may not be able to be altered at that stage. [redacted] added that it is specified in the REAC that the areas for compensation and ecological mitigation should be reviewed for archaeological implications based on what type of work is being undertaken on those areas. **ACTION: Point 5 to refer to Historic England in terms of advice and subsequent action to be taken regarding unexpected national significant designated heritage assets and archaeological findings and that any WSIs in this respect are developed in consultation with Historic England.** **ACTION: Historic England to feedback in writing on the draft DCO requirements.**	
4.	**Draft Environmental Statement: Chapter 11 Cultural Heritage** [redacted] acknowledged recipe of the draft ES chapter. [redacted] highlighted the aim was to ascertain from HiE whether there was agreement on the assessments and impacts, particularly in relation to Painshill and its constituent parts and to RHS Wisely and to the Bell Barrow. With respect to the Bell Barrow [redacted] noted that this is already impacted by M25 so the proposal is to limit the additional visual intrusion and put design in that helps people appreciate it better. [redacted] agreed that HiE's aim would be to ensure that the scheme does not exacerbate the current situation in relation to the Bell Barrow and if possible achieve betterment, that does not relate to restoration. [redacted] noted that HiE have no major points of disagreements in relation to the Cultural Heritage chapter. [redacted] added that they are reviewing the chapter from the perspective of 'level of harm' and that there were comfortable that there was no new areas of high harm and where there is moderate to low harm they are unavoidable and that to a large extent the existing situation is causing this. A discussion was had in regards to the recent targeted consultation drawings and the absence of gantries shown on maps in relation to Painshill Park and the associated visual intrusion. [redacted] noted that there are no gantries shown on some of the consultation drawings. [redacted] confirmed that there are gantries remaining in place but that these will be in a low cutting and therefore visual intrusion will be minimised. [redacted] requested that the SoCG refers to impacts of signage and lighting in respect of Painshill and well as RHS Wisley. **ACTION: Historic England to feedback on the targeted consultation (drawings) to confirm if there are any concerns.** **ACTION: Historic England to feedback on draft ES cultural heritage chapter confirm position (no further comments).**	
5.	**Statement of Common Ground (SoCG)**	

Contains *sensitive* information

	[redacted] confirmed that they had reviewed the SocG and could identify no major issues. He added that they would review the points of 'agreement' to check this was correct and also the items currently 'in-discussion' to determine what could be done to move them to 'agreed' where possible. [redacted] added that some items would remain' in-discussion' due to being part of the DCO process. [redacted] added that items could be termed 'agreed as far as possible at this stage in the DCO process' – as opposed to 'in-discussion'. [redacted] added that it would need to be reviewed by the legal team and that they could provide standard wording regarding the remit of Historic England [redacted] emphasised that Historic England wanted to be able to state that they do not want to be called at DCO examination unless something unexpected comes up. **ACTION: Historic England to provide standard wording on the remit of Historic England for inclusion in the SoCG and to feed back in writing on the SoCG and points 'in-discussion' or 'agreed' by 03.05.19**	
6.	**Next steps/AOB** [redacted] stated that Highways England are looking at use of designated funds to consider the movement of the pylons outside the Gothic Tower. A discussion was had regarding the feasibility of this. It was noted that this would we be costly and the feasibility is questionable as all three pylons would need to be moved. [redacted] suggested use of designated funds may be more effectively used to look at ways to help visitors understand the Tower. i.e. a compensatory measure to help people see what view would have been like. [redacted] confirmed that they are sympathetic to removing the pylons but agree with the feasibility issues associated with undertaking this. [redacted] stated that additional noise barriers on M25 are also being looked at adjacent to Painshill Park as part of designated funding. However these would need to be high and curved and may present issues re visual intrusion and wind resistance, in addition to air quality and impact on other side of barrier. [redacted] confirmed that both these issues are being explored with Painshill Park.	
7.	**Actions:** 1. Historic England to feedback in writing on the draft DCO requirements. 2. Historic England to feedback on the targeted consultation (amended drawings) to confirm if there are any concerns 3. Historic England to feedback on draft ES cultural heritage chapter confirm position (no further comments). 4. Historic England to provide standard wording on the remit of Historic England for inclusion in the SoCG and to feed back in writing on the SoCG and points 'in-discussion' or 'agreed' by 03.05.19	

Contains *sensitive* information

A.14 Email (10.05.19)

[redacted]

Thank you for your patience whilst we review the draft SOCG. I am pleased to now provide some comments to build on discussions held at the meeting on 17th April 2019. I can confirm that we are content with your notes of that meeting.

I agreed to provide a wording we use as standard for the remit of Historic England to be used in lieu of para 1.2.3. This is as follows

The role of Historic England and the DCO application

The Historic Buildings and Monuments Commission for England was established with effect from 1 April 1984 under section 32 of the National Heritage Act 1983, and since 1 1st April 2015 has been known as Historic England (and before that as English Heritage). It is a non-departmental public body sponsored by the Department of Digital, Culture Media and Sport (DCMS) with responsibilities for the historic environment in England.

I think para 3.2 is about more than just scheduled monuments and would be better titled Designated Heritage Assets.

In the table I think we are not fully agreed about the scheduled monuments of the Roman bath house and the Hengiform monument. We agree that the scheduled areas of these monuments will not be directly affected but we retain concerns for how changes as a result of the project may affect the contribution that their settings make to their significance. In particular we have in mind ecological/landscape compensation activities which might change the settings. This change could be either beneficial or harmful and we note that new tree planting is unlikely to be proposed as enhanced heathland environments are the desired outcome. Actions to achieve this could impact any undesignated archaeological remains outside of the scheduled areas and there is some possibility that these could have the same significance as the scheduled monuments themselves. We think that archaeological evaluation will be needed idc to understand the implications of any works and that based on the results of this "works" should be carried out in minimally harmful ways that will need to be set out in method statements and designs. **We think this means that this part of the project is best described at present as being in discussion and not agreed**.

As a general observation I think the SOCG should explain that it covers our position up to and including the submission of the DCO application and that we expect that there will be further discussions and partnership working if the DCO is approved and hence the project move into a detailed design stage by a main contractor appointed by Highways England. This may then require a further SOCG covering the detailed implementation of works. The template archaeological requirements shared with us and discussed on the 17th are then likely to form part of future agreements including for Written Schemes of Investigation when more specific impacts are known and an appropriate mitigation response to these can be agreed. This also applies to detailed design of features of the road proposal affecting the settings of the designated heritage assets e.g. any noise mitigation measures alongside Painshill Park or screening to enhance the scheduled barrows close to J10 itself.

Contains *sensitive* information

For the outline archaeological requirements the meeting notes pick up my point made then that whilst the Surrey CC archaeologists may be the first point of call for non-designated archaeological remains that may be revealed as part of the project, Historic England has a role for advice about the possible national significance of these and or what within the context of a live road construction would be the appropriate mitigation response.

I hope these comments are helpful and enable you to finish a draft SOCG that you can then again share with us for probable sign off. This should include the appendices. Due to leave (hers and mine) I have yet to consult our legal adviser and I anticipate doing so when we have the final draft before us.

Best wishes and do call me if any of this needs more discussion.

[redacted]

[redacted]
Team Leader - Development Advice (Kent , East and West Sussex and Surrey)
Regions Group

Direct Line [redacted]
Mobile phone [redacted]

Please note that our Guildford office has now closed and we are based in London as part of the London and South East Region. We will retain our strong focus on the local delivery of our services.

All email addresses and mobile phone numbers remain unchanged, including e-notification addresses for planning consultations.

Historic England
London and South East Region
Floor 4, The Atrium
Cannon Bridge House
25 Dowgate Hill
London EC4R 2YA

Historic England

Contains *sensitive* information

A.15 Email (12.06.19)

[redacted]

From: [redacted]
Sent: 12 June 2019 08:29
To: [redacted]
Cc: [redacted]
Subject: RE: M25 J10 Draft Environmental Statement: Cultural Heritage Chapter 11

[redacted]

Please excuse my lateness in responding but it has been a very busy period for Historic England over the last few weeks.

I can confirm that I am happy with your revised wording of the text for section 14 – Archaeology and specifically to clarify the potential role for Historic England should currently unknown and hence undesignated archaeological remains of national importance (or having the potential to be so) being discovered during delivery of this project. In such circumstances we would wish to be involved in helping the Undertaker and Surrey CC archaeologists to discuss and agree what an appropriate response might then be.

Thank you.

[redacted]

[redacted]
Team Leader - Development Advice (Kent , East and West Sussex and Surrey)
Regions Group

Direct Line [redacted]
Mobile phone [redacted]

Please note that our Guildford office has now closed and we are based in London as part of the London and South East Region. We will retain our strong focus on the local delivery of our services.

All email addresses and mobile phone numbers remain unchanged, including e-notification addresses for planning consultations.

Historic England
London and South East Region
Floor 4, The Atrium
Cannon Bridge House
25 Dowgate Hill
London EC4R 2YA

From: [redacted]
Sent: 03 June 2019 14:40
To: [redacted]

1

A.16 Meeting Note (01.10.19)

SNC·LAVALIN ATKINS Member of the SNC-Lavalin Group

Meeting Notes

Project:	M25 Junction 10/A3 Wisley Interchange Improvement Scheme		
Subject:	Historic England Relevant Representation and SoCG		
Meeting place:	Atkins London Nova North	Meeting no:	
Date and time:	01 October 2019, 1400 - 1600	Minutes by:	Lauren Whittle
Present:	[redacted]	Representing:	Historic England Historic England Historic England Atkins Atkins Atkins

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
1.	**Welcome and Introductions** [redacted] stated Historic England had submitted their relevant representation ([redacted]) and had reviewed the RRs received. [redacted] reported that there are no concerns from Painshill Park Trust (PPT) regarding cultural heritage impacts. [redacted] welcomed all to the meeting and introductions were given. [redacted] was not present at the meeting.		All
2.	**Project and Programme Update** [redacted] gave a broad overview of the project objectives and work involved. This included works on the M25 and widening of A3 between Painshill and Cobham, adding of the new access route to RHS Wisley (RHSW) and closing off the emergency access at Painshill to the Gothic Tower and new access to Painshill Park House (PPH) for residents.		[redacted]

Next meeting:			
Distribution:			
Date issued:	29 October 2019	File Ref:	

NOTE TO RECIPIENTS:
These meeting notes record Atkins understanding of the meeting and intended actions arising therefrom.
Your agreement that the notes form a true record of the discussion will be assumed unless adverse comments are received in writing within five days of receipt.

24.10.19_25_J10_Historic England meeting_01.10.19_FINAL 1

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	[redacted] gave an update on the project. He confirmed that the Development Consent Order (DCO) was submitted on the 17 June 2019 and was accepted 6 weeks later. The deadline for receipt of RRs was the 6 September 2019. He confirmed that 61 RRs were received. [redacted] confirmed that PINS will publish the Rule 6 letter which will set out the programme during examination. The letter is expected to be published on the 15 October 2019. ***Post Meeting Note: Confirmed.*** The Preliminary Meeting (PM) is expected to take place on the 12 November 2019. This will mark the commencement of examination which will last for 6 months. [redacted] stated that Highways England (HE)/Atkins are in the process of developing responses to the RRs. At present it is understood that these will not be issued back to the parties as this is an exercise in understanding and responding to issues in preparation for examination. ***Post Meeting Note: The responses to RRs will be submitted to PINS at Deadline 1***. All issues will be addressed via the Statements of Common Ground (SoCGs), with stakeholders or will be responded to directly by HE as a response to any written representation received. [redacted] stated that Historic England may have some additional comments to make on the DCO application on matters of detail and in respect of some of the wording in the draft DCO. Alongside this, HE's delivery partner, Balfour Beatty Atkins (BBA) are undertaking a validation exercise to assess the buildability of the scheme. If everything goes well, BBA will be appointed in November 2019 to deliver the detailed design and ultimately construction.		
3.	**Historic England Relevant Representation** [redacted] provided an update on the ecological compensation areas, highlighting these areas on the GIS map. She added that most of the areas are replacement land for the SPA. She confirmed the types of works being done within this, which include woodland thinning and clearance, some habitat replacement and some wood pasture planting. [redacted] stated that the biggest issue initially is the woodland clearance. [redacted] outlined the approach to woodland clearance. She added that Atkins had undertaken a site visit across the common with BBA and with their representatives of the timber clearance company, to discuss the mechanisms for woodland clearance. [redacted] stated that previously they have used existing pathways and put down brash		[redacted]

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	matting that the equipment drives over. The clearance is done by snipping or sawing the trees at stump level (15cm above ground) and then mechanically lifting them off to move them. The brash matting is then removed. [redacted] asked if the stump is left in situ. [redacted] confirmed that there is stump grinding in some places. She added that one option for this is chemical, meaning that there is no ground disturbance. [redacted] stated that HE/Atkins are meeting with Surrey County Council (SCC) on the 10 October 2019 to discuss the archaeological strategy for most of the areas where there is going to be stump grinding. She added that, because this will be for very specific areas, a watching brief will be most suitable. Areas of high sensitivity have been identified, particularly around the scheduled monuments, where the chemical method will be applied to minimise the ground disturbance. BBA have also confirmed that around the Bell Barrow, they will be able to get access from the already paved road using extended snippers without putting tracks on the ground in sensitive areas. In other sensitive areas that are not accessible from the paved area, they also have the option of putting down bog matting and running the vehicles on this as well as putting in a requirement for use of tread vehicles instead of track, which will effectively minimise the impact, except where stump removal will be an issue. [redacted] added that the contractors will not be going into the boundaries of the scheduled monument as these will be fenced off. [redacted] outlined the process for woodland thinning. She confirmed that the same approach would be adopted at the base but won't be grubbing out the stumps. The woodland planting areas will be done as slot planting which [redacted] confirmed will have a minimal impact on the actual ground levels. [redacted] referred to issues when the trees mature, which can't be predicted. [redacted] stated that most of the tree planting areas are sparsely planted and it has been recognised that some areas might have a high archaeological potential where these might be left as a clearing. She confirmed that the contractors won't be working in the boundary of any scheduled monuments/listed buildings. [redacted] confirmed that habitat replacement will be dealt with through the archaeological strategy by either surveying and trenching or strip map and sample. She confirmed that a lot of the area isn't suitable for geophysical survey, so strip map and sample may be preferable on a large scale. Atkins confirmed that they are looking at working with the construction contractors to discuss the building in of flexibility in case of identification of archaeology and identifying the priority area around the scheduled monument. [redacted] referred to the need for close		

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	coordination between the construction contractor and the archaeology contractor. [redacted] referred also to the provisions in the mitigation strategy and the DCO, where any remains that are of national significance would be assessed and reviewed by Historic England and SCC to determine the best way forward. [redacted] added that the project is not anticipating any finds of such significance so as to stop the project, but that excavation would be the solution. [redacted] highlighted one main compound which is near an area of archaeological importance (Bronze Age features). She added that it is not heavily wooded, so Atkins are proposing geophysical survey to identify any remains that might be affected by the compound but also to advise on site design layout to minimise any impacts. [redacted] stated that Historic England would be interested in what effect when mature, any tree planting could have on the setting of the scheduled monuments, for example, in relation to visual effect on barrows or to the known Roman site. [redacted] pointed out that the Roman site is outside the DCO boundary as well as the priority area surrounding it. [redacted] added that he is looking at unlikely effects, but that he is interested in when this is a mature landscape again, what it will look like, in so far as it provides some of the setting to the scheduled monuments. [redacted] stated that much of the area on Wisley Common is being restored to heathland following Surrey Wildlife Trust (SWT) guidance, which means that it will be restored to a more historically accurate landscape than the current pine planting. [redacted] commented that planting undertaken, primarily for ecological reasons, needs to be responsive to the potential for discovering, for example, a previously unknown barrow and can be amended. [redacted] confirmed that this had been discussed with the ecologists and BBA in respect particularly to the planting which is a much smaller areas than the thinning/clearing areas. [redacted] stated that there will be an archaeological strategy document which will cover all the programme of works that are occurring. [redacted] stated that Historic England will want to see this and have input, but that they will be leaving SCC to do the majority of the work. [redacted] stated that Historic England's input will be valued, especially if nationally significant remains are discovered. [redacted] stated that this strategy will be included in the detailed design phase and may be available during the course of the DCO examination. [redacted] confirmed that a draft will be available by the end of January. [redacted] asked how long the		

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	examination will last for. [redacted]confirmed that it will be 6 months.		
4.	**Painshill Park** The points raised in respect to Painshill Park (PP) in Historic England's RR were discussed. [redacted] noted that many of the points raised in the RR have been addressed in the SoCG. [redacted] referred to concerns regarding the balancing pond, removal of land at the northern boundary and the pedestrian bridge at PP. [redacted]confirmed that in terms of design, there have not been any major updates since the DCO submission. [redacted] referred to Historic England's request to be consulted in the preparation and approval of the design. [redacted]stated that, the way that requirements are written in the DCO at the moment do not allow for this *approval*, but he added HE/Atkins will continue to liaise and consult with Historic England to take all concerns into account. [redacted] confirmed that more details will be available on the noise barriers and lighting, for example. [redacted] asked what the timing of this will be. [redacted]confirmed that the design will be developed in parallel with the DCO examination. [redacted]emphasised that they are comfortable with the principle of what is being proposed and agree that Atkins have worked hard to minimise the harm, but that they are looking for a mechanism by which the very fine detail of the design is agreed whether this is during or post DCO examination. [redacted] suggested that a commitment to engage and consult with Historic England on the detailed design could be written into the SoCG. [redacted]added that this process should allow for Historic England to influence the design, **Action taken: Update the SoCG with a statement of commitment to consult Historic England on elements of the scheme in detailed design and how this would be resolved.** It was discussed by [redacted] and [redacted] what action would be taken if a more environmentally sensitive change to detailed design could be made if one was discovered. [redacted]was unsure how these changes could be made but noted that what is granted in the DCO will be built, as this is what will be given permission. [redacted]confirmed that the current methodology is to minimise the amount of road architecture in place, so that it's no worse than the current baseline. [redacted] agreed that this was a good principle to inform design. [redacted]stated that this kind of question might surface in the PM when the Examining Authority (ExA) invites written		[redacted]

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	questions. She added that ideally the SoCG would display something that Historic England are happy with. **RHS Wisley** [redacted] referred to the RHSW RR and their concerns, especially regarding access but that she was not sure whether their concerns related specifically to heritage, as the design was changed so as to take less land and not affect the historically significant trees and plantings. [redacted] added that the scheme does not impact the significance of the gardens or the house as a heritage asset. [redacted] added that its ability to function operationally successfully is important. [redacted] referred to the work being undertaken on access issues and traffic issues associated with design and construction. [redacted] outlined the current access route and the one proposed as part of the scheme. [redacted] referred to the impacts of the new route on RHSW which are relatively small but include two giant redwoods that might be affected, and some land take associated with the alignment of a bridge. He confirmed that overall the impacts were not considered to be significant at this stage. [redacted] referred to discussions on the prehistoric barrow and the procedure in place for review and input into detailed design, to see if there are means of incorporating enhancements to make it a better visitor attraction. [redacted] stated that it's a good example of a barrow however, but that its location impedes its interest because of the road close-by. [redacted] stated that they acknowledge that nothing can be done about the impact of the road and that they are focused in offsetting some of the inevitable harm. [redacted] confirmed that HE/Atkins are focusing on a mitigation strategy and incorporating some elements of community development into the strategy. [redacted] stated it would be good to agree a management plan that incorporated community outreach. [redacted] agreed that one of the best ways to get public buy-in is to encourage local engagement and raise awareness of the prehistoric landscape. [redacted] and [redacted] confirm that there are public rights of way that allow access but [redacted] states that some of these will be blocked off during construction. [redacted] stated that there are some areas in Ockham Bites (rest areas etc.) whereby a nearby interpretive set up could be prepared where some signage/QR code could connect members of the public to some more information. An example of this can be seen at Ockham Bites. Excavations nearby could be added into new signage and existing communications here. **Other scheduled monuments**		

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	[redacted] referred to the Roman Bath house as being taken out of the enhancement areas and the DCO boundary. [redacted] pointed on a map to areas of woodland thinning and clearance where there is a site compound and ancient woodland which has not been managed over the years. [redacted] commented that the antiquity of the ancient woodland in this location is questionable and the likelihood of there being heritage significance within the ancient woodland in fairly low. [redacted] added that there is no evidence that there were medieval management practices in this location. [redacted] confirmed that they would be recommending an archaeological watching brief for the soil scrapes when the translocation of soils is undertaken. [redacted] added that for the veteran trees, the stump is left and the trunk is used as to create a habitat in a different location. [redacted] confirmed that this is called tree salvage. He added that two veteran trees are being lost and nine are at risk but potentially being saved through refinements to the design. [redacted] referred to an area on the map with a substantial ditch and bank with hornbeams on it. [redacted] confirmed that here and the scheme includes paving a portion of Elm Lane that isn't paved already. [redacted] added that they have recommended a strip map and sample for most of the area. KN confirmed that if anything is found relating to the Roman road and bath house, then this will only be at the crossing of the M25 and is unlikely to be anything of extreme importance. [redacted] confirmed that there is no historic record of anything being found in this location. [redacted] referred to non-designated remains as having been discussed. [redacted] confirmed that Atkins are in discussion with SCC and will be developing a SoCG with them as well. [redacted] confirmed that she has made a start on the archaeological strategy and that this will be discussed with Historic England and SCC. **Misc.** The outline Construction Environmental Management Plan (CEMP) was discussed. [redacted] stated that Atkins draft the outline CEMP ahead of the contractor becoming involved and that it will be developed further finalised as part of the detailed design. This will then guide how [redacted] will go forward in the construction. [redacted] confirmed that it will include the archaeological strategy and any watching briefs. [redacted] stated that there were no issues with the DCO, but that their legal advice had been for more certainty with regards to some terminology and processes. This is a theme running through all of the DCO documentation for cultural		

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	heritage. It was acknowledged that this level of detail is not available as yet. [redacted] added that Historic England will be notified by PINS of the publication of the Rule 6 letter which will include details of dates for submission of Written Representations. **SoCG** [redacted] shared copies of the SoCG. She stated that it should be updated before the PM on the 12th November 2019. ***Post Meeting Note*: The Rule 6 letter gives the deadline of 17 December 2019 for submission of the SoCG to the ExA. The SoCG was reviewed for items that are 'under discussion'.** **Point 3.1 – cultural heritage and archaeology** Scheduled monuments in close proximity to J10. [redacted] stated that we could update this to indicate that along with the Outline Construction Environmental Management Plan (OCEMP), an archaeological strategy will be developed with Historic England and SCC to address the identification evaluation treatment of archaeological remains including the process for reviewing possible remains of national significance. [redacted] agreed for this item to be updated but to remain under discussion. [redacted] added that once the archaeological strategy is developed and agreed by everyone, this would take over from the SoCG and be included in the final Environmental Management Plan. **Points relating to Painshill Park on page 11** [redacted] stated that an undertaking can be added to state that HE/Atkins will consult Historic England further during detailed design. [redacted] commented that the creation of the emergency access to/from the gothic tower off the A3 which has been requested by Painshill Park in their RR would further disrupt the setting. [redacted] added that the current emergency access route through the park means that the disruption would not be significant and that this has been accepted by emergency services. [redacted] stated that if the resolution is that the emergency access will be provided from the A3 to the gothic tower, then Historic England would like to be consulted. [redacted] added that in terms of the DCO, if emergency access is needed safety will outweigh any impacts on heritage. [redacted] stated that through the statements of significance and the assessments in the Environmental Statement, we have demonstrated that we have considered surroundings of the gothic tower in full. This has involved considering the views from and towards it and		

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	its relationship to other aspects of the park. It was agreed that the status of this point could be 'agreed'. [redacted] confirmed that consultation will continue through the detailed design. PK agreed with this. **Page 12 – PP scheme impacts (noise).** It was agreed to add to this point the commitment to continue to consult and agree a mechanism for feedback on any design implications. Items to remain under discussion. With regards to noise barriers, [redacted] stated that sound from film is very rarely dependent on the area of filming, it is added in later. **Page 14 – Future development of PP** [redacted] stated that the cumulative effects have been completed. [redacted] stated that there is not any prospect of future development in Painshill Park as a result of access provided by the scheme. PK stated that this can be agreed. [redacted] added that Wisley Airfield has already been allocated within local planning. **Page 15 – RHS Wisley impacts on conservation areas and/or listed buildings (traffic)** This point related to traffic issues during construction and as a result of the scheme once constructed. [redacted] noted that there were concerns that people won't use the signed route (up the A3), but [redacted] stated that people were unlikely to be put off by a short extension to their journey as visitors often have long journeys to RHS Wisley and expect traffic anyway. [redacted] stated that there are traffic management plans in place. [redacted] added that there will be signage in place to prevent heavy vehicles using unsuitable routes and that traffic management plans will be detailed in the Outline Construction Environmental Management Plan (OCEMP) and that this will be developed by the Contractor. **Back to Future development on page 14** In relation to the NMU route, [redacted] referred to HE's response to the future development item on page 14, this will not be for the public but will be a private means of access and the NMU route will be on the other side of the A3. [redacted] stated that the same commitment to continue consultation throughout the detailed design with Historic England applies. **Scheme impacts (operational activities) – page 16**		

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	It was agreed that this is an operational issue for RHSW not a heritage issue and so can be removed from the SoCG. **Roman bath house (general scheme impacts)** [redacted] stated that this point relates to the fact that the archaeological strategy has already been discussed and that this item remains under discussion and needs to be referenced in the SoCG. **Scheduled monuments in close proximity to junction 10 (enhancement to setting - prehistoric barrows)** [redacted] confirmed that these would be part of the detailed design reviews, including the community involvement aspects of the archaeological strategy to enhance the awareness of the local public on the area's history. [redacted] stated that where there is harm, this is a good way to offset it. [redacted] added that the CEMP also specify that the archaeological mitigation would not only involve the excavation and analysis but also the publication and distribution of it and the archive. **Scheduled barrows** [redacted] stated that this could be condensed into one primary concern, which is the future of the scheduled barrows. [redacted] states that there are two main points to note: there will be an archaeological strategy and there will be a continuing consultation on design to minimise noise and visual impact. **Scheduled barrows (scheme impacts on unknown/other undesignated archaeological assets)** [redacted] stated that the last point will be picked up more in the archaeological strategy, where there might be undisturbed land, evaluation may be necessary or strip map and sample. [redacted] added that Written Statements of Investigation (WSIs) will be prepared in this respect. [redacted] added that on-site discussions are required for this, rather than any information in the archaeological strategy.		
5.	**Next steps/AOB** [redacted] stated that Historic England will receive the updated version of the SoCG after the 25th October in line with the timeframe for internal review of responses. [redacted] is conscious that [redacted] has public enquiry looming, but [redacted] has an archaeological background. [redacted] is away 11-20 October 2019.		All

A.17 Email (28.02.2020)

[redacted]

From: [redacted] <[redacted]>
Sent: 28 February 2020 14:47
To: [redacted]
Cc: [redacted]
Subject: RE: Outline for Archaeological Management and Mitigation Strategy (AMMS) – Overarching Written Scheme of Investigation - and SoCG items for review
Attachments: HE551522-ATK-GEN-RP-ZH-000002 HE SoCG 21 Feb 2020 signed.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Dear [redacted]

Please find attached the updated and signed SoCG. We are able to agree on point 3.2.17 but are not able to do so for the other points. I have addressed this below, with [redacted]'s original comments in bold:

SoCG item 3.1.5:
We propose this item can now agreed, following your review of the outline AMMS. The AMMS includes the requirement to consult with you in regards to any non-designated archaeological assets of national significance, through a WSI. This is also a requirement of the CEMP and the dDCO (Requirement 3 and 14).

Historic England: We think that the DCO (Requirement 14) should include reference to the Framework WSI/ AMMS.

We are broadly content with the outline of the AMMS that is presented, although we recommend that the "Archaeological Baseline" section should be a primary section, rather than a sub-section of "Purpose and Scope", and should include an assessment of the heritage significance of known remains and archaeological potential, in the context of a wider assessment of the archaeology of the area. Subsequent assessment of impacts should relate back to the assessment of heritage significance. We would wish to see a developed draft of this document, if not a final draft, before we could express our approval.

Because these two matters remain unresolved we consider section 3.1.5 of the SoCG to remain under discussion.

SoCG item 3.2.4:
The location of the bridge has been moved further south and we understand that you have confirmed that you are content with its location. We propose that this item can be agreed, providing you are content with the outline AMMS and the commitment to consult during detailed design (on the bridge design), which is requirement of the CEMP.

Historic England: We are content with this location, which we think will cause less harm than the more northerly one to the Grade II* Gothic Tower. However, we think that the bridge will still cause some harm to the heritage significance of the Gothic Tower (less than substantial harm), and we advise that this should be acknowledged so that it can be taken into account by the ExA.

1

SoCG item 3.2.14:
The location of the signage and lighting will be dictated by highways design. We will continue to engage and consult on detailed design (as a requirement of the outline CEMP), but it is not possible to guarantee any control over the location of the signage and lighting as this will be dictated by highways design. We propose that this be agreed, based on the premise of on-going engagement and consultation.

Historic England: The height of the lighting columns and the detailed design of the gantries remain unclear but the CEMP does not specifically say that we would be consulted on the design. With respect to other matters, such as landscaping and noise barriers, the CEMP promises consultation with us. We think that lighting columns and gantries have the potential to be harmful to the heritage significance of the park and therefore we think we have received insufficient detail to agree to this point at this stage.

SoCG item 3.2.17:
We suggest this item be removed as the area around the Roman Bath House is no longer within the boundary of the Scheme. As such there is no remit to undertake any works in the area that will be either beneficial or potentially harmful to its setting.

Historic England: The status of this issue can be identified as "Agreed".

SoCG item 3.2.18:
We propose that this point can be agreed, based on the assurance of on-going engagement and consultation during detailed design as outlined in the AMMS and secured by the outline CEMP.

Historic England: In the SoCG you refer to Junction 1 but we assume this is meant read junction 10.

The CEMP only refers the Cockcrow Hill barrow and not to the Hengi-form monument at Red Hill or the Bowl Barrow West of Cockcrow Hill.

We have not yet seen any "details outlining the process for consultation on detailed design". If they have been produced please would you signpost them to us?

If the mitigation for the barrows and other features affected by the Scheme, particularly in respect of noise and visual impact, is to be made during the detailed design what provision is made to secure this?

We will be pleased to discuss this matter further; however, in view of the queries above, we consider section 3.2.18 of the SoCG to remain under discussion.

SoCG item 3.2.19
We propose that this point can be agreed, as above for 3.2.18.

Historic England: We see that our recommendation is "noted" but not "agreed" in this instance. Furthermore, the Outline CEMP does not seem to specifically provide for investigation to enhance understanding of the potential for other archaeological remains in the barrow's surrounds for the purposes that we mention. If this is provided for please would you refer us to the provision?

We will be pleased to discuss this matter further; however, for now, we consider section 3.2.19 of the SoCG to remain under discussion.

We also raise that the CEMP refers to discussions with Greater London Archaeological Advisory Service (p95, 114 and 121). We are under the impression that the red line does not reach into the adjoining London boroughs, in which case GLAAS would not be providing advice on this DCO. Please can this be clarified?

I am on leave for a week from this evening, but please do not hesitate to contact me if you have any questions regarding this and I will reply as soon as possible on my return.

Kind regards

[redacted]

[redacted]

Assistant Inspector of Historic Buildings and Areas

Regions Group

Mobile phone [redacted] Telephone [redacted]

[redacted]

Historic England

We are the public body that helps people care for, enjoy and celebrate England's spectacular historic environment, from beaches and battlefields to parks and pie shops.
Follow us: Facebook | Twitter | Instagram Sign up to our newsletter

From: [redacted]
Sent: 19 February 2020 14:40
To: [redacted]
Cc: [redacted]
Subject: Outline for Archaeological Management and Mitigation Strategy (AMMS) – Overarching Written Scheme of Investigation - and SoCG items for review

THIS IS AN EXTERNAL EMAIL: do not click any links or open any attachments unless you trust the sender and were expecting the content to be sent to you

Dear [redacted]

Please find attached for your review, the outline for the Archaeological Management and Mitigation Strategy (AMMS). We had an action to share this with you as noted at our meeting with you on the 01.10.19.

As you may know, the SoCG we have with you can be submitted with updates at Deadline 5 (03 March). We are therefore proposing the resolution of the below outstanding items, based on your review of the AMMS (with the exception of item 3.2.17).

We would be grateful if you could review the AMMS and the below SoCG items and provide your feedback. We will, dependent on your response to the below points, send you an updated SoCG for you to sign.

In terms of timing and to submit an updated SoCG by 03 March if possible, would you be able to respond by 26 February? If you would prefer a meeting/telecall to discuss these points please let me know.

Many thanks
[redacted]

SoCG item 3.1.5:
We propose this item can now agreed, following your review of the outline AMMS. The AMMS includes the requirement to consult with you in regards to any non-designated archaeological assets of national significance, through a WSI. This is also a requirement of the CEMP and the dDCO (Requirement 3 and 14).

SoCG item 3.24:
The location of the bridge has been moved further south and we understand that you have confirmed that you are content with its location. We propose that this item can be agreed, providing you are content with the outline AMMS and the commitment to consult during detailed design (on the bridge design), which is requirement of the CEMP.

SoCG item 3.2.14:
The location of the signage and lighting will be dictated by highways design. We will continue to engage and consult on detailed design (as a requirement of the outline CEMP), but it is not possible to guarantee any control over the location of the signage and lighting as this will be dictated by highways design. We propose that this be agreed, based on the premise of on-going engagement and consultation.

SoCG item 3.2.17:
We suggest this item be removed as the area around the Roman Bath House is no longer within the boundary of the Scheme. As such there is no remit to undertake any works in the area that will be either beneficial or potentially harmful to its setting.

SoCG item 3.2.18:
We propose that this point can be agreed, based on the assurance of on-going engagement and consultation during detailed design as outlined in the AMMS and secured by the outline CEMP.

SoCG item 3.2.19
We propose that this point can be agreed, as above for 3.2.18.

[redacted]
Senior Consultant – Stakeholder Engagement

Tel: [redacted]
DD: [redacted]

Please note my working days are Tuesday to Thursday

Atkins – South East Roads Investment Programme

Working on behalf of Highways England

Highways England Customer Contact Centre
0300 123 5000
www.highways.gov.uk

A.18 Meeting Minutes (15.04.2020)

SNC·LAVALIN ATKINS Member of the SNC-Lavalin Group

Meeting Notes

Project:	M25 Junction 10/A3 Wisley Interchange Improvement Scheme		
Subject:	Historic England SoCG		
Meeting place:	Skype	Meeting no:	
Date and time:	15 April 2020; 12.00-1.00pm	Minutes by:	[redacted]
Present:	[redacted]	Representing:	Historic England Historic England Atkins Atkins

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
1.	**Purpose of meeting:** [redacted] outlined the purpose of the meeting which was to discuss the outstanding issues in the Historic England (HiE) SoCG. She noted that PINS had requested that for the final version to be submitted to PINS for Deadline 8 (01 May 2020), all issues had to be 'agreed' or 'not agreed'. [redacted] refereed to HiE's feedback on the outstanding issues in their email of 28.02.20 as being the focus of discussion.		
2.	**Outstanding SoCG issues:** Each issue as referenced in the email of 28.02.20 was discussed in turn: **Item 3.1.5:** [redacted] outlined HiE's feedback on this point in their email of 28.02.20. She noted that HiE's request to include the 'assessment of the heritage significance of know remains and archaeological potential, in the context of a wider assessment of the archaeology of the areas' in the		

Next meeting:			
Distribution:			
Date issued:	20 April 2020	File Ref:	

NOTE TO RECIPIENTS:
These meeting notes record Atkins understanding of the meeting and intended actions arising therefrom.
Your agreement that the notes form a true record of the discussion will be assumed unless adverse comments are received in writing within five days of receipt.

M25_J10_Historic England meeting_15 04 20_FINAL 1

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	AMMS, is contained with the Environmental Statement (ES). She added that the AMMS is for dealing for impacts on known and unknown archaeology. [redacted] confirmed that Atkins are developing the AMMS but that this is not going to be finalised by Deadline 8 (D8). She also noted that the assessment of impacts on non-designated archaeology has been agreed with Surrey County Council (SCC) to be addressed by the AMMS which is a requirement of the Environmental Management Plan (EMP) and of the draft DCO (dDCO). This ensures that it is a technical requirement for the scheme as opposed to an 'option'. She added that anything of national significance will be dealt with in consultation with HiE as previously agreed with HiE, included in Requirement 14 of the dDCO and detailed in the REAC and EMP. [redacted] commented that HiE thought a framework for WSI was needed but that there was no provision for this in the draft DCO. [redacted] clarified that the project is calling this an AMMS or an overarching WSI and these are included in the dDCO. She added that the dDCO refers to WSIs for individual elements in addition to an overarching WSI or AMMS. [redacted] confirmed that they had no issue with the AMMS, just that they have not had sight of the developed draft. [redacted] confirmed that the AMMS (aka overarching WSI) is a requirement of the DCO (Requirement 14), the requirement being that it needs to be agreed with HiE before it can be implemented. [redacted] requested that a signpost to the relevant clause in the dDCO that requires that AMMS to be approved prior to implementation be sent to HiE. **ACTION: Atkins to send link to Requirement 14 of the dDCO highlighting relevant section.** **Post meeting note: Information sent to HiE on 17.04.20** **Item 3.2.4** [redacted] noted that this item refers to Scheme impacts (bridge) on the Gothic Tower. [redacted] reiterated HiEs comments that that they are content with the location of the bridge, which HiE consider will cause less harm. [redacted] stated that the assessment of harm to the Gothic Tower was completed and is contained in the ES submitted with the dDCO (dDCO) and the Statement of Significance (SoS), which identified that there is a slight adverse impact which would not result in substantial harm to the Gothic Tower.		

2

SNC·LAVALIN ATKINS Member of the SNC-Lavalin Group

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	She confirmed that the ES did acknowledge some residual impact to the bridge in terms of setting, however there was no requirement within the Environmental Impact Assessment (EIA) regulations to note that there is a level of less than substantial harm. She added that the ExA is aware of the impact to the Gothic Tower and that this was acknowledged in the issue specific hearings in January. [redacted] confirmed that if this is referred to in the ES then that addresses HiEs concerns. [redacted] emphasised that there is no requirement to consult on the bridge design and added that the ES states that the detailed design (DD) cannot deviate from the preliminary design submitted for the DCO. She added that as the design would not impact the significance of the Gothic Tower, aside from very limited changes, changes to the DD of the bridge is unlikely. [redacted] asked [redacted] whether HiE are agreed on the assessment of impacts to the Gothic Tower. [redacted] confirmed yes. [redacted] added that HiE reviewed the ES chapter in April and stated that they agreed with the results of the assessments. Impacts were 'slight' or 'negligible'. [redacted] referred to the SoS – one of the significance of the Gothic Tower was the view – this being the wideness of the view as opposed to the 'content' of the view and that this would not be changed by the presence of the bridge in another location. [redacted] confirmed that HiE ([redacted]) had confirmed that the moving of the bridge would reduce the harm. [redacted] stated that the negligible or slight adverse effect, identified in the ES is not the same as saying a low level of harm. [redacted] noted that there was concern that the level of harm from the scheme was not fully considered in terms of a scale of harm. While it was acknowledged that the scheme would not result in "substantial harm", there was no recognition of what was the level of harm. HiE comments relate to the recognition that some harm would occur and that this should be brought to the attention of the Planning Inspectorate. [redacted] confirmed that the impact has been acknowledged and submitted to PINS and that in an issue specific hearing the ExA had asked about level of harm and was only concerned whether the criteria for substantial harm was met. She confirmed that they were aware of the		

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	low-level impact and have so far been content with response provided by Highways England. [redacted] state that PINS have a duty to consider all harm to designated heritage assets. [redacted] added that HiE would need to have raised this in a Written Representation for this to be reviewed by PINS. She confirmed that Highways England/Atkins have provided the ExA with the assessment in terms what is required for the dDCO and NPPF and that no more information has been requested. [redacted] confirmed that it would be possible to agree this item but that they would need to confirm this following this meeting. He confirmed no further information on this was required in order to feedback by the deadline of the 20 April. [redacted] questioned whether there was any issues regarding a commitment to consult on DD. [redacted] stated that as part of the AMMS, elements of the DD will be submitted to HiE for consultation. [redacted] questioned whether consultation would be necessary given there is no significant harm to the bridge. [redacted] questioned whether there was a requirement in the CEMP to be consulted. [redacted] confirmed that there was for design that will impact any designated assets or heritage assets, but to note that in this instance there weren't any significant impacts. **ACTION: [redacted] to check the wording of the CEMP to see what it says on the design reviews and to check what the AMMS will need to include.** [redacted] has raised concerns regarding of the wording of the CEMP with the DCO team and has been informed that it is being amended to ensure detailed design information is provided to HiE where there is the potential for impacts to designated heritage assets. [redacted] agreed that HiE do not want to be consulted on the design where there are no effects. [redacted] suggested that the SoCG be updated to reflect this. **ACTION: [redacted] to update SoCG to state that HiE do not need to be consulted on the DD of the bridge where there are no significant impacts.** **Post meeting note: Updated SocG sent to HiE on 17.04.20** **Item 3.2.14** [redacted] noted that this issue was similar to 3.2.4 in that the		

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	results of the ES assessments did not detract from the heritage significance of RHS Wisley. She stated that it was unclear how lighting will impact as the lighting and gantries will be replaced like for like. [redacted] stated it was likely this could be agreed therefore, but she would like to check the detail before confirming. **ACTION [redacted] to go back and look at the ES in terms of lighting and signage and impacts for RHS Wisley prior to confirming HiEs agreement on this item.**		
3.	**Item 3.2.18** [redacted] noted that in the ES, assessments in respect of noise showed there to be no increase and that the project were looking at decreasing noise levels through use of road surface materials. [redacted] referred to conversations with [redacted] noting that as the setting is already adversely affected by the M25, the minor changes re view at Cockcrow Hill do not add to the harm that is already in existence. She noted that there is the potential for enhancement works at the scheduled monument (Cockrow Hill Barrow) if visual or noise barriers are erected and that this part of the DD will be submitted to HiE as part of the AMMS. She added that there is also requirement to consult the public, not on the mitigation of impacts but to use the scheme itself to enhance understanding of the barrows if that is possible. The DD for this area will be review by SCC and HiE due to the archaeological impacts. It is at this point it will be determined whether noise walls would be beneficial or not. [redacted] clarified that the point here is that there are already noise impacts. [redacted] confirmed yes and that the assessment in the ES noted no permanent increase in noise – as such there does not seem to be requirement for noise walls at that location, but it may be that during DD it is determined that they could be beneficial, not as mitigation but as enhancement. [redacted] confirmed that the Scheme can avoid impacting the scheduled part of the monument but as far as the contribution of visual and noise atmosphere to the setting this is already adversely affected by the existing road. [redacted] requested signposting to the provision within the dDCO for consultation on this. [redacted] confirmed that this is in the CEMP. **ACTION: [redacted] to signpost to this provision in the CEMP. Post meeting note: Information sent to HiE**		

5

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	on 17.04.20 [redacted] confirmed that the Hengi-form monument at Red Hill has been removed from the scheme boundary so there is not much scope to do enhancement at this location. The impact to the Bowl Barrow west of Cockrow Hill is similar to Cockrow Hill Barrow. **ACTION: - Atkins/Highways England to amend the CEMP to link it to the Bowl Barrow West of Cockrow Hill. This will be an addition to the DD that specifies that any enhancements should include any nearby scheduled monuments (archaeological landscape approach).** **ACTION: To update the SoCG item to state that the final CEMP will be amended to take into account the archaeological landscape approach not individual monuments (so Bowl Barrow). This item can be then agreed.** **Post meeting note: Updated SoCG sent to HiE on 17.04.20** **Item 3.2.19** It was agreed this was a similar issue to that of 3.2.18. [redacted] confirmed that this item refers to impacts on unknown designated archaeological assets and that this is being addressed by the overarching WSI/AMMS – and is also being addressed through consultation with the SCC archaeologist, who is a consultee for non-designated heritage assets. She added that been walk over surveys had been carried out, but LiDAR did not show anything due to land management/use. [redacted] referred to HiE's comments on the CEMP as noted in their email of 28.02.20. She confirmed that this is being addressed by the overarching WSI which will include strip map and sample for the work being done in this area. She reiterated that the AMMS is a requirement of the DCO under the provisions of the CEMP. She asked HiE if the enforceability of the AMMS can be agreed whether this item could be agreed. [redacted] commented yes HiE can also agree this, if the SoCG is amended as for 3.2.18 to state that the final CEMP will address the potential for archaeological remains in the barrow's surround. [redacted] asked how the management of the barrows as a pair will be addressed. [redacted] stated that this is land managed by SWT and its therefore outside the scope of the DCO application. She added that Atkins/Highways England we have no way of enforcing management activities onto SWT for this. She confirmed that SWT do have a		

Printed on paper from well-managed forests and other controlled sources.

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ
Highways England Company Limited registered in England and Wales number 09346363