

**A57 Link Roads**

**TR010034**

**9.19 Statement of Common Ground with  
Historic England**

Rule 8(1)(e)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

January 2022

# Infrastructure Planning

## Planning Act 2008

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

### A57 Link Roads Development Consent Order 202[x ]

---

#### 9.19 STATEMENT OF COMMON GROUND WITH HISTORIC ENGLAND

---


<b>Rule Number:</b>	Rule 8(1)(e)
<b>Planning Inspectorate Scheme Reference</b>	TR010034
<b>Application Document Reference</b>	TR010034/EXAM/9.19
<b>Author:</b>	A57 Link Roads Project Team, National Highways and Atkins

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
Rev 1.0	January 2022	Deadline 2

## DRAFT STATEMENT OF COMMON GROUND

**This Draft Statement of Common Ground has been prepared and agreed by (1)  
National Highways Limited and (2) Historic England**

To be signed prior to examination

Signed   
**Andy Dawson**  
**Project Manager**  
**On behalf of National Highways**  
**Date: 12<sup>th</sup> January 2022**

Signed..  ....  
Tim Allen  
Team Leader  
**On behalf of Historic England**  
**Date: 12<sup>th</sup> January 2022**

# Table of contents

<b>1. Introduction</b>	<b>5</b>
1.1. Purpose of this document	5
1.2. Parties to this Statement of Common Ground	5
1.3. Terminology	5
1.4. Addressing Rule Six requirements	6
<b>2. Record of Engagement</b>	<b>9</b>
<b>3. Issues and matters to be agreed from Rule Six Letter Annex E</b>	<b>11</b>

# 1. Introduction

## 1.1. Purpose of this document

- 1.1.1. This Draft Statement of Common Ground ("SoCG") has been prepared in respect of the proposed A57 Link Roads scheme (previously known as Trans-Pennine Upgrade) ("the Scheme") and the application ("the Application") made by National Highways Limited ("National Highways") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 ("the Act").
- 1.1.2. This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available on the Planning Inspectorate website.
- 1.1.3. This SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to the SoCG, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

## 1.2. Parties to this Statement of Common Ground

- 1.2.1. This SoCG has been prepared by (1) National Highways as the Applicant and (2) Historic England.
- 1.2.2. National Highways (formerly 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 the then 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 (now National Highways).
- 1.2.3. Historic England is the government's statutory adviser on the historic environment, championing historic places and helping to understand, value and care for them. Historic England is an executive non-departmental public body, sponsored by the Department for Digital, Culture, Media & Sport.

## 1.3. Terminology

- 1.3.1. 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.
- 1.3.2. 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, 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.

## 1.4. Addressing Rule Six requirements

1.4.1. The document evidences meeting of the conditions set out within Annex E of the Rule Six letter from the Examining Authority, dated 19 October 2021. Historic England is a Category D interested party. The SoCG will address the following requirements within Annex E through the associated sections outlined in tables 1.1 and 1.2 below.

**Table 1.1: Section Six Letter Annex E Requirement for all category A-D parties**

Annex E Requirement	Relevant SoCG section
Applicable legislation and policy considered by the Applicant	1. Legislation and Policy <ul style="list-style-type: none"> <li>1.1 DCO articles and associate schedules</li> <li>1.2 DCO Requirements</li> <li>1.3 Protective Provisions</li> <li>1.4 Other DCO matters</li> </ul>
The Applicant's assessment and the proposed mitigation measures: <ol style="list-style-type: none"> <li>1. The adequacy of the assessment and mitigation for each environmental topic. Consideration of scope, methodology, study area, receptors and their sensitivity. Baseline conditions, how they were identified and whether all necessary information was obtained given the restrictions during the Coronavirus (COVID-19) pandemic</li> <li>2. The flexibility sought for the detailed design, construction, and operational phases. Whether the extent of flexibility adopted in the Rochdale Envelope for assessment and evidence is consistent. The extent of the Rochdale Envelope. How the reasonable worst-case scenario has been assessed.</li> <li>3. The magnitude and duration of construction and operational phase effects, mitigation, opportunities for enhancement, residual effects after mitigation and their significance, monitoring and maintenance.</li> <li>4. Whether any scoping out of detailed assessment is consistent with applicable legislation and policy, including the National Policy Statement for National Networks and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.</li> <li>5. Whether the assessment methodology reflects best practice, whether it has been applied consistently, and whether the assessment of significant residual effects is fully evidenced and reasoned. Uncertainty arising from Coronavirus (COVID-19).</li> <li>6. The application of professional judgements and assumptions.</li> </ol>	2. Assessment and proposed mitigation <ol style="list-style-type: none"> <li>2.1 Environmental assessment and mitigation               <ol style="list-style-type: none"> <li>2.1.1 Adequacy of assessment for each environmental topic</li> <li>2.1.2 Adequacy of mitigation for each environmental topic</li> <li>2.1.3 Methodology</li> <li>2.1.4 Baseline conditions and coronavirus</li> </ol> </li> <li>2.2 Flexibility and worst case scenario</li> <li>2.3 Construction and operational effects</li> <li>2.4 Scoping out of detailed assessment and National Policy Statement for National Networks</li> <li>2.5 Assessment of methodology and best practice</li> <li>2.6 Application of professional judgements and assumptions</li> <li>2.7 Mitigation and outline environment management plan</li> <li>2.8 Residual impacts and securing of mitigation measures</li> <li>2.9 Cumulative impacts</li> <li>2.10 The significance of each residual impact</li> </ol>

Annex E Requirement	Relevant SoCG section
7. The need for and adequacy of outline/ draft mitigation and management strategies and plans, including the Outline Environmental Management Plan. 8. Whether the mitigation measures, including embedded measures, are secured and are likely to result in the identified residual impacts, consistent with the Environmental Statement 9. The assessment of cumulative effects and the other plans and projects included in the cumulative impact assessment 10. The significance of each residual impact	
Whether the mitigation identified in the Environmental Statement is adequately secured by the combination of Requirements in the draft Development Consent Order with other consents, permits and licenses	3. Environmental Statement and DCO requirements
The draft Development Consent Order Requirements and associated provisions and documents; whether they are reasonable and relevant to planning and the development to be consented; whether they are enforceable and precise; whether they secure the proposed mitigation and monitoring; and whether any additional provisions are necessary	4. DCO requirements and associated provisions and documents
Matters for which detailed approval needs to be obtained, the proposed procedures for consultation on and the discharge of Requirements, and for approvals, consents, and appeals, including arbitration, and the roles of the local authorities and of other statutory and regulatory authorities	5. Matters for detailed approval
The identification of consents, permits or licenses required before the development can become operational, their scope, management plans that would be included in an application, progress to date, comfort/ impediments and timescales for the consents, permits or licenses being granted	6. Other consents and permits
Opportunities for enhancement and environmental benefits.	7. Opportunities for enhancement and environmental benefits.
Human rights and equalities duties	8. Human rights and equalities duties
Any other relevant and important considerations	9. Any other relevant and important considerations



**Table 1.2: Section Six Letter Annex E Requirement for only category D parties**

Annex E Requirement	10. Issues to be resolved with Historic England
<p>The matters listed under the following heading in the ExA's Initial Assessment of Principal Issues:</p> <p>1. The historic environment</p> <ul style="list-style-type: none"> <li>A) Whether the effects of the construction and operational phases of development on the Cultural Heritage and archaeology of the site have been adequately assessed and if the post development interpretation details are appropriate.</li> <li>B) Adequacy of desk based and on-site assessment.</li> <li>C) Zone of theoretical visibility and identification of viewpoints.</li> <li>D) The effects on designated and non-designated heritage assets including, but not limited to, Melandra Castle Roman Fort, the Church of St Michael and All Angels, other listed buildings and conservation areas.</li> <li>E) The effects on the historic landscape. Page 4 of 8</li> <li>F) The effects on the setting of the Peak District National Park.</li> <li>G) The extent and effects of below ground works.</li> <li>H) Archaeological assets discovered during construction</li> <li>I) Whether there would be any sterilisation of archaeological sites.</li> <li>J) Opportunities for Public Benefit.</li> <li>K) Whether any harm would be substantial or less than substantial and weighting against public benefits.</li> </ul>	<p>10.1 The matters listed under the following heading in the ExA's Initial Assessment of Principal Issues:</p> <p>10.1.1 The historic environment</p> <ul style="list-style-type: none"> <li>1. Whether the effects of the construction and operational phases of development on the Cultural Heritage and archaeology of the site have been adequately assessed and if the post development interpretation details are appropriate.</li> <li>2. Adequacy of desk based and on-site assessment.</li> <li>3. Zone of theoretical visibility and identification of viewpoints.</li> <li>4. The effects on designated and non-designated heritage assets including, but not limited to, Melandra Castle Roman Fort, the Church of St Michael and All Angels, other listed buildings and conservation areas.</li> <li>5. The effects on the historic landscape. Page 4 of 8</li> <li>6. The effects on the setting of the Peak District National Park.</li> <li>7. The extent and effects of below ground works.</li> <li>8. Archaeological assets discovered during construction</li> <li>9. Whether there would be any sterilisation of archaeological sites.</li> <li>10. Opportunities for Public Benefit.</li> <li>11. Whether any harm would be substantial or less than substantial and weighting against public benefits.</li> </ul>
<p>Any other relevant matters included in the ExA's Initial Assessment of Principal Issues</p>	<p>10.2 Any other relevant matters included in the ExA's Initial Assessment of Principal Issues</p>
<p>Any other matters on which agreement might aid the smooth running of the Examination and assist the ExA's recommendation to the Secretary of State</p>	<p>10.3 Any other matters on which agreement might aid the smooth running of the Examination and assist the ExA's recommendation to the Secretary of State</p>



## 2. Record of Engagement

2.1.1. A summary of the meetings and correspondence that has taken place between National Highways and Historic England between June 2016 and January 2022 in relation to the Application, is outlined in Table 2-1.

**Table 2.1: Record of Engagement between National Highways and Historic England**

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
27/06/2016	Meeting	Statutory Environmental Body Meeting No. 1 attended by Historic England, Peak District National Park, Natural England and Environment Agency. <ul style="list-style-type: none"> <li>Introduction to the Scheme and the options</li> </ul>
24/05/2017	Meeting	Statutory Environmental Body Meeting No. 2 attended by Historic England, Peak District National Park, Natural England and Environment Agency. <ul style="list-style-type: none"> <li>Discussion of results from the public consultation</li> </ul>
27/06/2021	Meeting	Statutory Environmental Body Meeting No. 3 attended by Historic England, Peak District National Park, Natural England and Environment Agency. <ul style="list-style-type: none"> <li>Discussion on the preferred route announcement and DCO process.</li> </ul>
30/04/2021	Teams Meeting	Key topics discussed were: <ul style="list-style-type: none"> <li>Scheduled Monument: Melandra Roman Fort</li> <li>Grade II* Listed Buildings: Church of St Michael and All Angels and the medieval cross in Mottram-in-Longdendale</li> <li>Grade II Listed Buildings: Mottram Old Hall, Dial House, Dial Cottage and Woolley Farmhouse</li> <li>Woolley Farmhouse</li> <li>Mottram-in-Longdendale Conservation Area</li> <li>Proposed mitigation relating to designated heritage assets</li> <li>Approach to geoarchaeology and archaeological evaluation</li> </ul>
17/09/2021	Email	Email from Tim Allen, Historic England Development Advice Team Leader (North) in relation to Relevant Representation response deadline. The email stated: <i>"We have had detailed pre-application discussion with Highways England regarding this scheme which spans our Midlands and North-West Regions. We have no objection to the grant of DCO, matters raised by us have or are being been positively addressed. The submitted material reflects our positive engagement with the applicant and we look forwards to providing further technical advice as field investigations are completed and reported upon. We will be happy to memorialise our advice and position through a SoCG with Highways England."</i>
10/11/2021	Email	Email from Tim Allen, Historic England Development Advice Team Leader (North) in relation to query about Statement of Common Ground. Email outlined that Historic England are happy to sign up to a brief and tightly focussed SoCG that memorialises dialogue so far.

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
29/11/2021	Email	Email from Gareth Talbot, Atkins to confirm agreement on general matters for all category A-D parties from Annex E.
01/12/2021	Email	Email from Tim Allen confirmed A-D requirements all agreed. Requested expansion of points within section 4 relating specifically to the historic environment.
11/01/22	Teams meeting	Finalisation of Statement of Common Ground in relation to issues and matters from the Rule Six Letter Annex E.

Note: Meeting invites are not included in the table above

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

### 3. Issues and matters to be agreed from Rule Six Letter Annex E

3.1.1. Issues Related to Rule Six Letter Annex E

3.1.2. Category A-D requirements were agreed with Historic England by email on 01 December 2021.

**Table 3.1: Statement of Common Ground (SoCG) Between National Highways and Historic England (HE) Table of Issues/Matters - Final version to be complete for Deadline 2 submission on 14 January 2021.**

SoCG Ref. Number	Relevant examination document	Relevant Issue	Historic England (HE) comment	National Highways response	Status
<b>10. Historic England Issues</b>					
<b>10.1 The matters listed under the following heading in the ExA's Initial Assessment of Principal Issues:</b>					
<b>10.1.1 The historic environment</b>					
<b>10.1.1.1 Whether the effects of the construction and operational phases of development on the Cultural Heritage and archaeology of the site have been adequately assessed and if the post development interpretation details are appropriate.</b>					
10.1.1.1.1	Environmental Statement Chapter 6 Cultural Heritage [APP-062]	Adequacy of assessment of effects of construction and operation on the Cultural Heritage and archaeology of the site.	At the meeting on April 30 2021, an overview of the assessment methodology and approach was provided along with a summary of impacts on key assets.	HE confirmed in the meeting on 30 April 2021 that they were satisfied with the approach to assessment and cultural heritage strategy to address archaeological issues in a manner appropriate to their significance and proportionate to their importance through a programme of archaeological investigation, analysis and dissemination and archiving.	Agreed.

### 10.1.1.2 Adequacy of desk based and on-site assessment.

10.1.1.2.1	<p>Environmental Statement Chapter 6 Cultural Heritage [APP-062]</p> <p>Environmental Assessment Appendix 6.1 Cultural Heritage Desk Based Assessment [APP-160]</p>	Adequacy of desk based and on-site assessment.	At the meeting on 30 April 2021, an overview of the assessment methodology and findings was presented, including the desk-based assessment and site inspections.	<p>HE confirmed in the meeting on 30 April 2021 that they were content with the described approach.</p> <p>The on-site assessment is an ongoing assessment as of January 2022.</p> <p>HE confirmed on 11 January 2022 that they are content that archaeological evaluation is addressing those areas of archaeological interest and potential that have been identified. The findings of current investigations will be subject to further dialogue as an iterative process.</p>	Agreed.
------------	---	--	--	--	---------

### 10.1.1.3 Zone of theoretical visibility and identification of viewpoints.

10.1.1.3.1	Environmental Statement Chapter 6 Cultural Heritage [APP-062]	Assessment of potential visual impacts on the setting of heritage assets.	In the meeting held 30 April 2021, HE did not ask for additional viewpoints to those already prepared.	At the meeting on 11 January 2022 HE confirmed they were content with the approach taken to the use of the ZTV and viewpoints in this specific project.	Agreed.
------------	---	---	--	---	---------

### 10.1.1.4 The effects on designated and non-designated heritage assets including, but not limited to, Melandra Castle Roman Fort, the Church of St Michael and All Angels, other listed buildings and conservation areas.

10.1.1.4.1	<p>Environmental Statement Chapter 6 Cultural Heritage [APP-062]</p> <p>Register of Environmental Actions and Commitments [APP-184]</p>	<p>Melandra Roman Fort (Scheduled Monument, List Entry Number: 1004595).</p> <p>Potential impacts on views from the Scheduled Monument and whether a lighting strategy for</p>	At the meeting held on 30 April 2021, landscaping proposals and lighting proposals were presented to HE.	HE confirmed in the meeting on 30 April 2021 that they were content with the described approach.	Agreed
------------	---	--	--	--	--------

		the scheme has been prepared.			
10.1.1.4.2	<p>Environmental Statement Chapter 6 Cultural Heritage [APP-062]</p> <p>Register of Environmental Actions and Commitments [APP-184]</p>	<p>Church of St Michael's and All Angels (Grade II* Listed Building, List Entry Number: 1356436) and medieval cross, War Hill (Grade II* Listed Building, List Entry Number: 1068028).</p> <p>Presentation of updated designs showing the Scheme within the assets' setting.</p>	<p>Updated designs were presented at the meeting held on 30 April 2021, showing reduced visual impacts on the assets compared to previous designs.</p>	<p>HE confirmed in the meeting on 30 April 2021 that the new design changes have reduced overall impact on cultural heritage, compared to earlier designs.</p>	Agreed
10.1.1.4.3	<p>Environmental Statement Chapter 6 Cultural Heritage [APP-062]</p> <p>Register of Environmental Actions and Commitments [APP-184]</p>	<p>Mottram Old Hall (Grade II Listed Building, List Entry Number: 1138842), Dial House (Grade II Listed Building, List Entry Number: 1068024), Dial Cottage (Grade II Listed Building, List Entry Number: 1162700) and Woolley Farmhouse (Grade II Listed Building, List Entry Number: 1356438)</p>	<p>At the meeting on 30 April 2021 an overview of ground truthing assessments on the assets that are in close proximity to the Scheme was given. This confirmed that the siting of the Scheme in cutting as it passes Mottram Old Hall, Dial House and Dial Cottage will aid screening from the assets. Confirmation was given that although the tree belt associated with Mottram Old Hall will be partially removed, mitigation will be implemented.</p> <p>Landscape mitigation proposals in relation to Woolley Farmhouse considered to be acceptable.</p>	<p>HE confirmed in the meeting on 30 April 2021 that they were satisfied with the overview and proposals.</p>	Agreed



		Close proximity of these assets to the Scheme, and potential impacts.			
10.1.1.4.4	<p>Environmental Statement Chapter 6 Cultural Heritage [APP-062]</p> <p>Register of Environmental Actions and Commitments [APP-184]</p>	<p>Mottram-in-Longdendale Conservation Area. Benefits that the Scheme will deliver within the conservation area and setting impacts.</p>	<p>At the meeting on 30 April 2021 an overview of the key benefits that the Scheme will deliver within the conservation area, including reduced traffic, was given.</p> <p>An overview was also given of the impact on the setting of the conservation to the east, associated with the introduction of Mottram Moor Junction. The predicted increase in north-south traffic through the conservation area and an associated increase in noise was also noted.</p> <p>Landscape and lighting designs aiming to minimise these impacts were presented.</p>	HE confirmed in the meeting on 30 April 2021 that they were satisfied with the overview and proposals.	Agreed
10.1.1.4.5	Register of Environmental Actions and Commitments [APP-184]	Appropriateness of mitigation for designated heritage assets.	<p>Overview of mitigation for impacts on the setting of heritage assets was given at the meeting on 30 April 2021. This noted that mitigation will be embedded as an integral part of the scheme design including the use of false cuttings, protecting existing vegetation, sympathetic landscape planting and the avoidance of direct physical impacts through the management of construction works.</p>	HE confirmed in the meeting on 30 April 2021 that they were satisfied with the overview and proposals.	Agreed



10.1.1.1.6	<p>Environmental Statement Appendix 6.2 Archaeology Scope of Works and Written Scheme of Investigation [APP-161]</p> <p>Environmental Statement Appendix 6.2 Geoarchaeological Assessment and Deposit Model Report [APP-165]</p>	<p>Geoarchaeological and archaeological investigations.</p> <p>Appropriateness of approach.</p>	<p>At the meeting on 20 April 2021 an overview of the geoarchaeology deposit model was given, this indicated that the topography is relatively low-lying and influenced by the water environment.</p> <p>An overview of the approach to archaeological investigation, with an emphasis on the evaluation approach, was given.</p>	<p>HE confirmed in the meeting on 30 April 2021 that they were satisfied with the overview and approach to archaeological investigations (evaluation). HE noted the potential for significant findings in a relatively small area, and the potential for impacts on programme and budget were highlighted.</p> <p>HE noted the need to tackle high risk areas (such as close to the River Etherow) or where complicated engineering is required as early as possible to reduce risk to programme.</p> <p>Overall HE confirmed they were satisfied with the progress and design changes to date and noted the need to consult with their Science Advisor as archaeological investigations proceed.</p>	Agreed
10.1.1.1.7	<p>Relevant Representation Email from Historic England – 17/09/2021 [AS-001]</p>	<p>Historic England Relevant Representation</p>	<p>Historic England submitted a Relevant Representation on 17/09/21, in this they stated:</p> <p><i>We have had detailed pre-application discussion with Highways England [National Highways] regarding this scheme which spans our Midlands and North-West Regions.</i></p> <p><i>We have no objection to the grant of DCO, matters raised by us have or are being been positively addressed. The submitted material reflects our positive engagement with the applicant and we look forward to providing further technical advice as field investigations are completed and reported upon. We will be happy to memorialise our advice and position through a SoCG with</i></p>	<p>National Highways appreciate the support.</p>	Agreed

			<i>Highways England [National Highways].</i>		
<b>10.1.1.5 The effects on the historic landscape.</b>					
10.1.1.5.1	Environmental Statement Chapter 6 Cultural Heritage [APP-062]	Effects on the historic landscape from construction and operation of the scheme.	At the meeting on 11 January 2022 HE confirmed they are content with the assessment approach provided in the Environmental Statement and did not request further synthetic work on effects on the historic landscape in this instance.	No further comment.	Agreed.
<b>10.1.1.6 The effects on the setting of the Peak District National Park.</b>					
10.1.1.6.1	Environmental Statement Chapter 6 Cultural Heritage [APP-062]	Impacts on setting of the Peak District National Park from construction and operation of the scheme.	At the meeting on 11 January 2022 HE confirmed they are content with the assessment approach provided in the Environmental Statement and did not request further synthetic work on effects on the Peak District National Park in this instance.	No further comment.	Agreed.
<b>10.1.1.7 The extent and effects of below ground works.</b>					
10.1.1.7.1	Environmental Statement Chapter 6 Cultural Heritage [APP-062]	Impacts on buried archaeological remains. Appropriateness of approach.	At the meeting on 30 April 2021, an overview of the archaeological baseline conditions, archaeological evaluation works and the findings of the impact assessment were presented.	HE confirmed in the meeting on 30 April 2021 that they were satisfied with the overview and proposals. At the meeting on 11 January 2022, it was noted by HE that the ongoing site evaluation works will provide a basis for further dialogue around the control and mitigation of direct and	Agreed.

				collateral effects of construction on buried remains.	
<b>10.1.1.8 Archaeological assets discovered during construction</b>					
10.1.1.8.1	Environmental Statement Chapter 6 Cultural Heritage [APP-062]  Register of Environmental Actions and Commitments [APP-184]	The procedure for dealing with archaeological assets discovered during construction.  Adequacy of archaeological mitigation measures.	HE confirmed on 11 January 2022 that they are content with the approach set out in the Environmental Statement and the draft DCO Requirement 10. These include arrangements for planned archaeological mitigation measures and reactive safeguards for unexpected discoveries.	No further comment.	Agreed.
<b>10.1.1.9 Whether there would be any sterilisation of archaeological sites.</b>					
10.1.1.9.1	Environmental Statement Chapter 6 Cultural Heritage [APP-062]	Removal of archaeological sites by construction.	At the meeting on 11 January 2022 HE stated that with the benefits of seeing the results of the current trial trenching programme, it will be possible to understand potential impacts in detail and discuss the options for impact minimisation or preservation in situ, versus excavation on the basis of detailed evidence.	Development of archaeological mitigation proposals is an ongoing iterative process. Engagement with heritage consultees will be ongoing throughout this.	Agreed.
<b>10.1.1.10 Opportunities for Public Benefit.</b>					
10.1.1.10.1	Environmental Statement Chapter 6 Cultural Heritage [APP-062]	Identification of opportunities for public benefit.	HE response 11 January 2022: The Environmental Statement and the resulting archaeological fieldwork strategy will deliver public benefits through the dissemination of the results	Opportunities for the delivery of public benefits through the Designated Funds are being explored. Any such works will not form part of the mitigation delivered under the DCO and will be contingent on approval of the funding application process.	Agreed.

			<p>of assessment and mitigation works directly arising from the road scheme.</p> <p>Additionally, further public benefits could be delivered through National Highways Designated Funds to enhance the conservation, public enjoyment and understanding of heritage assets outside of, but related to the scheme.</p>		
<b>10.1.1.11 Whether any harm would be substantial or less than substantial and weighting against public benefits.</b>					
10.1.1.11.1	Environmental Statement Chapter 6 Cultural Heritage [APP-062]	The balance of harm to heritage significance against public benefit resulting from the Scheme.	At the meeting on 11 January 2022, HE confirmed they are content with the assessment in respect of impacts on designated assets, and the approach to the assessment of impact to non-designated assets including archaeological remains.	<p>Assessment undertaken for the Environmental Statement has not identified substantial harm to result for any designated heritage assets. Non-designated archaeological assets located within the red line boundary are likely to experience substantial harm as a result of construction.</p> <p>Minimisation and mitigation of impacts proportionate to the significance and importance of the affected non-designated assets is an ongoing process informed by current field assessment work and dialogue.</p>	Agreed.

© Crown copyright (2022).

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence:

visit [www.nationalarchives.gov.uk/doc/open-government-licence/](http://www.nationalarchives.gov.uk/doc/open-government-licence/)  
write to the Information Policy Team, **The National Archives, Kew, London TW9 4DU**,  
or email [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk).

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

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