



EAST OF ENGLAND OFFICE

A47 Case work Team  
*By Email Only*  
A47WansfordtoSutton@planninginspectorate.gov.uk

Our ref: PL00331862  
Your ref: TR010039

14 February 2022

Dear A47 Team

Re: ExA 1st written questions

Please find below Historic England response to the ExA 1st written questions at Deadline 1

Please note the test refers to both HBMCE and HMBCE to refer to the Historic Buildings and Monuments Commission for England. Just to confirm it should be HBMCE or we can be referred to as Historic England.

| Question Reference | Question  | Historic England (HBMCE) response     |
|--------------------|---|---------------------------------------|
| 1.4.3              | <p>Identification of heritage assets</p> <p>a) Do the IPs agree with the list of heritage assets identified in Appendix 6.1 [APP-085]?<br/>b) If not</p> <p>(i) if the party considers any heritage asset has been omitted could they please set out a table of such assets and why they consider each to be of heritage significance</p> <p>(ii) if the party considers that any identified assets should not be considered to be a heritage asset or has been incorrectly attributed (for example to an incorrect list), again could they be set out in a table and explain why they hold the view they do?</p> | Please see our Written Representation |
| 1.4.4.             | <p>Identification of heritage assets</p> <p>It is not clear from paragraph 6.6.67 of Chapter 6 of the ES [APP-044] whether the Stamford to Wansford railway line is being considered as a non-designated heritage asset in its own right or as part of the "group".</p>   | Please see our Written Representation |




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|        | <p>a) Could the Applicant please clarify, and could IPs give their opinions as to how it should be considered?</p> <p>b) If the Applicant or any IP considers that the railway line should be considered to be a non-designated heritage asset in its own right, could they please provide a plan showing the geographic extent.</p>  |  |
| 1.4.5. | <p>Assessment of non-designated heritage assets</p> <p>a) Could the Applicant and IPs give their view as to whether in the light of the decision of the High Court in <i>Save Stonehenge World Heritage Site Limited v Secretary of State for Transport</i> [2021] EWHC 2161 (Admin) the effect on each non-designated heritage asset should be considered individually rather than as a group?</p> <p>b) If the Applicant takes the view that each non-designated heritage asset should be considered individually could it please undertake such an assessment for all assets which have been considered as a group</p> | <p>As set out in para 5.122 and 5.123 of the NPSNN, “those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called “heritage assets” ... Some heritage assets have a level of significance that justifies official designation.” Paragraph 5.124 and 5.125 go on to note how these should be considered, with paragraph 5.127 making it clear that the applicant should describe the significance of any heritage assets affected, including any contribution made by their setting.</p> <p>It is therefore important that the applicant assesses heritage assets appropriately and presents that evidence in accordance with policy.</p> |
| 1.4.8. | <p>Scheduled monument north of A47 (List entry 1006796)</p> <p>Could the Applicant and HBMCE please provide the full description of the cropmark site of a barrow cemetery and quadrilateral ditched enclosure with pits and a pit alignment?</p>   | <p>The official legal description and map is available on this <a href="#">link</a> or by cutting and pasting the into a browser</p>  <p>A PDF is also attached</p>  |
| 1.4.9. | <p>Scheduled monument north of A47 (List entry 1006796)</p> <p>Could HBMCE please set out why it considers List entry 1006796 meets the criteria as a scheduled monument, and particularly why the southern part both within and immediately to the north of the application site are significant either as part</p>  | <p>We have set out a consideration of the significance of the asset in our Written Representation.</p> <p>Following consideration of the Written Rep should the ExA require further information, then Historic England would be pleased to provide a</p>   |





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|         | <p>of the monument itself or its setting (this should be differentiated).</p> <p>The ExA would like to make clear it is not for it to go behind the designation of the scheduled monument, but rather to ascertain what harm (in all senses) may be caused to the scheduled monument and its setting, and thus its significance, by the Proposed Development.</p> <p>HBMCE should be aware that a number of IPs consider that any significance that the southern part of the site may have had has been lost due to works that have taken</p>  | <p>response for the next suitable deadline.</p>   |
| 1.4.15. | <p><b>Archaeology</b></p> <p>a) Paragraph 6.5.9 of Chapter 6 of the ES [APP-044] indicates some areas have not been archaeologically tested. How can the SoS assess the particular significance of any heritage asset that may be affected (NPSNN, paragraph 5.128) if there is no available evidence on this?</p> <p>b) Similarly, paragraph 6.6.73 of Chapter 6 of the ES [APP-044] sets out the various zones of archaeological interest. Neither Zone 8 nor Zone 9 has been surveyed.</p> <p>c) Is it intended to undertake any further survey work?</p> <p>d) If so, when will those results be reported?</p> | <p>Historic England considers it is best practise to undertake assessments, surveys and evaluation prior to the examination, however we are aware this is not always possible for a number of reasons; therefore, this remains a matter for the applicant and for the LPA archaeological advisors to agree the timetable and approach for further work.</p> |
| 1.4.18. | <p><b>Archaeology</b></p> <p>Paragraph 6.8.19 of Chapter 6 the ES [APP-044] indicates that PCC “usually requires archaeological WSIs to be written by the appointed archaeological contractor undertaking the work”. However, this paragraph continues “government policy may require an agreed scope of works in order to undertake appropriate procurement”. Do HBMCE and PCC have any views on this approach?</p>   | <p>See Written Rep</p>  |
| 1.4.20. | <p>Wansford Road Railway Station</p> <p>a) The Applicant has indicated that it considers that the loss of the Wansford Road Railway Station would result in a moderate adverse significance of effect. Do IPs agree with this analysis?</p>  | <p>We have set out a consideration of the significance of the assets, and the policy position in our Written Representation.</p>  |





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|         | <p>b) If not, could the party please explain why they hold that view?</p> <p>c) Could the Applicant please explain how its approach is reconciled with the advice in the PPG Reference ID: 18a-018-20190723 relating to substantial harm and less than substantial harm.</p> <p>d) Could the parties please set out the level of harm that they consider would be caused by the Proposed Development for the Wansford Road Railway Station in all its elements, both individually and cumulatively?</p> <p>e) Could the Applicant please explain what its proposals are for the recording of the asset, and how they would be secured?</p> <p>f) It is suggested by PCC that the Station Building may be dismantled and re-erected in another location. Could the Applicant please give its response to this suggestion and if it is agreeable, explain where it would be located and how this would be secured?</p> <p>g) Could the Applicant please explain further its proposals for the gate piers at the station?</p> | <p>Following consideration of this should the ExA require further information, then Historic England would be pleased to provide a response for the next suitable deadline.</p>  |
| 1.4.24. | <p>Assessment</p> <p>Table 5 in Appendix 6.1 (Cultural heritage information) [APP-085] sets out the Applicant’s assessment of impacts prior to mitigation.</p> <p>a) Do the IPs agree with the Applicant’s assessment of impacts as set out in this Table?</p> <p>b) If not, could the IP please set out their view, giving a reasoned explanation for the view that they hold?</p>  | <p>Historic England broadly support the approach taken by the applicant in coming to these conclusions. We have identified some differences through using the approach and language adopted in planning policy which are identified in our Written Rep</p> |
| 1.4.25. | <p>Recording of heritage assets</p> <p>Do PCC and HMBCE agree that the methods of recording heritage assets when there are interventions/demolition as set out in Section 8.3 of Chapter 8 of the ES [APP-046] are appropriate?</p>  | <p>Historic England consider this to be primarily a matter for the applicant and for the LPA heritage and conservation advisors</p>  |
| 1.6.40. | <p>Schedule 2 – General</p> <p>Could PCC, NE, EA and HMBCE please check Schedule 2 and confirm whether they are content as regarding consultations prior to discharge of Requirements? If they consider that they should be additionally included or</p>   | <p>Please see comments ion our written rep</p>   |





Historic England

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|  | excluded from any particular Requirement could they please explain why they believe that to be appropriate? |  |
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If there are any further material changes to the proposals, or you would like further clarification in relation to our advice, please contact us.

Yours sincerely

Will Fletcher

Dr Will Fletcher

Team Leader



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