



EAST OF ENGLAND OFFICE

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

Our ref: PL00331862
Your ref: TR010039

09 June 2022

Dear A47 Team

Re: ExA 3rd written questions

Please find below Historic England response to the ExA written questions published on the **24th May 2022**.

Question Reference	Question	Historic England (HBMCE) response
3.4.1	<p>Scheduled monument north of A47 (List entry 1006796)</p> <p>In the Minutes of the Meeting held on 15 June 2007 set out in Appendix O of the Scheme Assessment Report 2018 – Appendices Preferred Route Decision in relation to Option 3 [AS-031] in paragraph 7.0 it is stated that Option 3 was rejected because “we [the now Applicant] cannot demonstrate a wholly exceptional case for progressing with Option 3”. Option 3 being a route through the Scheduled Monument.</p> <p>NPSNN paragraph 5.131 indicates that the “wholly exceptional” test applies when there would be “substantial harm”, (this test does not apply to less than substantial harm) and it must therefore be assumed that this must have been the judgement in question. Reference ID 18a-018-20190723 of the PPG gives guidance on substantial harm and less than substantial harm.</p> <p>(a) Could the Applicant please set out precisely why it considered that Option 3</p>	<p>We are aware that Option 3 has not been progressed to a full scheme proposal. Our understanding is therefore based upon the schematic drawing provided in the document referenced (Scheme Assessment Report 2018 – Appendices Preferred Route Decision in relation to Option 3) [Examination Reference AS-031]. This scenario shows the proposed carriageway passing through the southern part of the scheduled monument and would result in the loss of this part of the monument and reduction in its overall size and area.</p> <p>This would result in the loss of important elements and features that contribute to the overall significance of the asset. In particular, construction of a new double carriageway in this location would result in the total loss of a number of the key burial features that make up the late Neolithic and early bronze age burial cemetery. These features, particularly the</p>



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749

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	<p>would lead to “substantial harm”. The minutes only state that this decision was based on the “risk that Historic England will object”, and the comment at 3.1 of the Applicant’s response to Written Representations [REP3-026] of “Bifurcation of the Scheduled Monument would result in substantial harm in either eventuality” is assertion as it does not explain why it considers substantial harm would be occasioned. The ExA would particularly appreciate documents dating contemporaneously (2017) with this decision.</p> <p>(b) Could HMBCE please provide its assessment in relation to route Option 3 (ie through the Scheduled Monument) in terms of whether this would result in substantial harm, less than substantial harm (quantifying if necessary), or preserve, providing justification for its conclusion?</p>	<p>barrows and ring ditches are an important part of its designation. They have high archaeological and historic interest and therefore removal of these features would severely compromise the integrity of the cemetery as a whole and diminish the heritage values of the remaining part of the monument.</p> <p>In our view the loss of key features the reduction of the overall designated area, the loss of integrity and the resulting loss of significance is likely to equate to substantial harm.</p>
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We trust this of assistance.

Yours sincerely

Will Fletcher

Dr Will Fletcher

Team Leader

