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ExA Q1 Deadline 14th December 2021

Questions to Historic England and responses

Ref	Question	Answer
1.7.1	<p>Statement of Common Ground</p> <p>It is noted that matters within the Statement of Common Ground as relate to Cultural Heritage are marked as 'not agreed' in Table 5-1 of the Statement of Commonality [APP-419]. Is the position reconcilable or are there fundamental matters of dispute that are unlikely to be resolved through Examination?</p>	<p>The following matters are not currently in agreement:</p> <ol style="list-style-type: none">1. Insufficient evidence base within Chapter 6 of the Environmental Statement (ES). In particular, Historic England is aware that a full Desk-Based Assessment was omitted from the ES and the archaeological trial trenching (Appendix 6.5), was undertaken late in the pre-application period and so the results could not be fully integrated into the ES;2. Enhancement and management for Emma's Grove Barrows alongside improved connectivity of calcareous grassland;3. Pre-Construction and construction buried archaeology mitigation needs to be agreed; and4. The Scheme has not provided any enhancement of Crickley Hill Camp and by association Peak Camp. <p>It is however hoped that all matters not agreed are reconcilable. Historic England (HE) is working collaboratively with the Applicant and other parties and require the following in order to resolve these matters:</p> <ol style="list-style-type: none">1. For ES Chapter 6 HE recognises that further baseline information will not be undertaken and Chapter 6 will not be rewritten. The results of the issues identified within the Chapter are being worked through as HE agree the mitigation through the Detailed Archaeological Mitigation Strategy and Overarching Written Scheme of Investigation (6.4 ES Appendix 2.1 EMP Annex C) (DAMS/OWSI) which HE will require to be agreed to be secured by the Development Consent Order ("DCO").2. HE needs to see a sustainable and long-term management solution to the enhancement and management of Emma's Grove Barrows. The barrows need to be under grass and incorporated into the adjoining field



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		<p>as part of the calcareous grassland creation to the northeast of the Barrows.</p> <ol style="list-style-type: none">3. The DAMS/OWSI have to be able to respond to unexpected archaeology that may be of national importance, which is a resource of High Value, as well as the areas already identified for pre-construction excavation.4. For Crickley Hill and Peak Camp HE would like the Applicant to address and identify measures to reduce the noise and screen the road better from the two High Value sites <p>To resolve these matters we are doing the following:</p> <ol style="list-style-type: none">1. HE accepts and acknowledges Chapter 6 of the ES is a point in time and no further information will be provided. HE has therefore used its own knowledge and understanding of the archaeology to address and identify the impacts and mitigation needed.2. HE is working with National Highways (NH) to find a solution. HE met with NH on the 5 October 2021 to discuss concerns and HE's suggestions moving forwards. NH took our ideas away to look into whether they would be feasible. NH gave an update on progress on this at the SoCG meeting on the 7 December 2021. The enhancement and management is being reviewed and there is potential to open the site up more, there isn't an opportunity to retain the land as part of the NH estate after construction. The revised enhancement and management will be included in the revised ES to be submitted at Deadline 2.3. HE was sent a revised draft DAMS/OWSI on the 22 November 2021. This was discussed with the GCC Heritage Team on the 6 December 2021. At that meeting we agreed the DAMS needed significant work: there was no mention of geoarchaeological works or paleoenvironmental investigations prior to and during the mitigation, the mitigation areas need to be altered to include areas where archaeology was uncovered and the impacts for each area need to be clarified (compound, road, drainage, etc.).
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		<p>This was discussed with NH on the 7 December 2021 at the SoCG meeting. It was agreed that we would send over general comments on the DAMS to be included in the revised version to be submitted at Deadline 1. We then agreed that the finer detail would be discussed during the examination. Currently the DAMS has identified 16 areas for full excavation and 10 areas for SMS work across the scheme. HE agree with most of these areas but will be asking NH for changes and additional areas to ensure all the potential archaeology can be excavated and recorded.</p> <p>4. HE is aware that the National Trust are also raising the impact on Crickley Hill as an issue in their Representation. We will collaboratively work with them and NH to look at options to reduce the noise levels and provide enhancement of Crickley Hill for visitors. This will also improve the experience for walkers on the Cotswold National Trail and to the Country Park.</p> <p>As reflected within the above all of the matters listed in table 5-1 are not yet agreed. It is hoped that the agreement of the DAMS/OWSI will resolve Historic England's concerns in respect of the issues listed in Table 5-1 of the Statement of Commonality.</p>
1.7.3	<p>Assessment Criteria a) Do Historic England agree with the assessment criteria as listed in Table 6-4 of ES Chapter 6 [APP-037]? b) Does this represent a proportionate and appropriate approach?</p>	<p>a) Table 6-4 appears to combine Table 3.4N with Table 3.7 from DMRB LA104 – Environmental Assessment and Monitoring. Generally, Historic England agrees with this with the exception of the following;</p> <p>There is a reference to 'Slight Adverse' effect within Table 6-4 of ES Chapter 6 and that this is not a material consideration in the decision-making process. An Adverse effect under Table 3.4N of the DMRB means there is some form of loss or alteration which is harmful to the asset. This would equate with less than</p>



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		<p>substantial harm in NPPF terms. Under Table 3.2N a designated heritage asset would be a High value receptor/ resource.</p> <p>Although a Slight Adverse Effect is not a material consideration in the decision-making process under DMRB (Table 3.7) under NPSNN (5.131) and NPPF (199); any harm caused to a heritage asset needs to have clear and convincing justification and the higher the significance the greater the weight. This is especially the case if there is a slight adverse impact to a resource of high value. In such a case, this should be taken into account by the decision maker (6.4 ES Chapter 6 – Cultural Heritage 6.4.11).</p> <p>An example of this is in relation to Crickley Hill Camp, where a slight adverse significant effect is identified. According to Table 6-4 it appears that this identified effect would not be a material consideration in the decision-making process. As there will be a change to the setting of the Camp, which does cause harm to its significance, (see response to Q1.7.1.9 c)), under NSPNN and NPPF this harm needs to be taken into consideration.</p> <p>Historic England requests that this reference to Slight Adverse description is reviewed and a caveat added that if the identified resource is of high significance it will be a material consideration in the decision-making process in accordance with NPSNN and NPPF.</p> <p>There appears to be a cut and paste error under Neutral - the first line talks about 'in the townscape'. This scheme does not impact on a townscape so this sentence isn't relevant.</p> <p>b) With the exception of the comments made above in respect of the references to "slight adverse", it is HE's opinion that the response is proportionate and appropriate.</p>
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<p>1.7.8</p>	<p>Paleoenvironmental Deposits In paragraph 6.8.7 of ES Chapter 6 [APP-037] there is reference to paleoenvironmental deposits being affected by hydrological changes. There are however no further references to this within the context of this ES Chapter (other than a brief mention at 6.10.17 discounting any effect). Why is this considered sufficient consideration of the matter and please explain any effects?</p>	<p>This is not sufficient consideration of the matter.</p> <p>The study area includes at least two tufa producing streams, reflecting the complex hydrology of the area; one close to Shab Hill and another by Grove Farm (6.4 ES Appendix 13.11 Water Features Survey, sites 69, G231, 81, G135 and G4).</p> <p>The hydrological assessment appendix (6.4 ES, Appendix 13.7) covers the need for dewatering from a construction point of view but not the impact of dewatering upon buried deposits.</p> <p>During the archaeological trial trenching (6.4 ES, Appendix 6.5) colluvium (a deposit which forms by gravity at the base of slopes over time, also known as hillwash) was found within the DCO boundary in these areas (Trial Trench no's in brackets):</p> <ul style="list-style-type: none">• Cowley roundabout (245 and 300)• North of Birdlip Quarry (211 and 213)• Along southern edge of Coldwell Bottom, north of the Roman/Saxon settlement (104, 105 and 106)• East of Emma's Grove (88 and 85) <p>These findings indicate that colluvium is present in a number of locations. When looking at the topography there are also a number of dry valleys along the route which correspond with the locations above (Coldwell Bottom, Nettleton Bottom, and other unnamed ones near Cowley roundabout and along the slopes of Crickley Hill) all of which have a high potential to contain colluvium. Such deposits could be sealing localised waterlogged deposits.</p> <p>There is one known small peat deposit identified within the scheme, near Grove Farm. This is not recorded in the ES Chapter 9 Geology and Soils report. The Chapter only mention the possibility for peat in 9.7.8. The peat is known from a borehole taken in 1989 for a previous A417 road widening scheme (BGS</p>
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		<p>Borehole ref:SO91NW125 [REDACTED]).</p> <p>These deposits (peat and waterlogged material) will contain environmental evidence (insets, seeds, pollen, etc.) which will tell the story of the climate and environment over the past 10,000 years. They may also hold evidence for human activity from early prehistory as the colluvium can be very thick and provide a protective buffer over the deposits meaning they are not impacted by later farming practices (ploughing, etc.). The deposits are very vulnerable to change and have potential to be impacted by changes in hydrology, in particular dewatering of areas as drainage is changed, as part of the construction process. Once dewatered they would rapidly decay and paleoenvironmental information would be lost if not sampled first.</p> <p>The NPSNN asks the Secretary of State when considering the impact of a development on any heritage asset that they should take into account the particular nature of the significance of the asset and the value that they hold for this and future generations (5.129 and NPPF 195). Paleoenvironmental deposits are particularly high value resources as they can contain significant amounts of information regarding the climate and environment over the past 10,000 years. If not properly assessed and protected or mitigated that significance will be lost and the knowledge that the deposits would provide about climate trends and environmental change as well as early human use of the area.</p> <p>In our guidance regarding preserving archaeological remains (Historic England 2016 Preserving Archaeological Remains [REDACTED] [REDACTED] [REDACTED]) under decision-taking for sites under development we set out the assessment needed to understand those changes. Section 4.3 and section 4.4. deal with</p>
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		<p>issues of dewatering and the need to understand the hydrology of the site sufficiently. A Tier 1 Hydrological Assessment would need to be carried out for known, suspected or recently discovered waterlogged remains ahead of construction.</p> <p>In this instance the archaeological trial trenching is insufficient to identify the presence of waterlogged archaeological deposits of paleoenvironmental potential.</p> <p>We have been informed at the SoCG meeting on the 7th December that the next phase of Geotechnical works are about to start. These will be overseen by a geo-archaeologist. The results of that work won't be available till September 2022. To ensure we have data available sooner to inform the archaeological mitigation the geo-archaeologist will provide monthly updates (e-mail from ARUP sent 7 December 2021). We are yet to agree on how this is to be secured and will continue discussions with the Applicant to ensure we are kept informed through the Examination of the survey results. We acknowledge that this depends on the survey programme. Should this work extend beyond the Examination we would seek to secure this through the CEMP.</p> <p>We are seeking through our comments on the DAMS sent 8 December to NH to ensure suitable Paleoenvironmental Assessment, through geo-archaeological surveys, is undertaken pre-construction to inform the hydrological and drainage strategy post-construction. If deposits are identified that will be impacted by dewatering these will be investigate accordingly so there is no loss of knowledge.</p>
1.7.9	Impacts on Heritage Assets a) Do you agree with the summaries contained in Tables 6-6 and 6-8 of ES Chapter 6 [APP-037]?	a) HE have produced an advice note on Setting ("GPA3: The Setting of Heritage Assets). GPA3 recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to the complexity of the case, from straightforward to complex:



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	<p>b) Are there any specific entries into that table where either the setting, the nature of the impact, magnitude of impact or significance of effect are disputed?</p> <p>c) If so, which entries and why?</p>	<p>Step 1: Identify which heritage assets and their settings are affected Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it Step 4: Explore ways to maximise enhancement and avoid or minimise harm Step 5: Make and document the decision and monitor outcomes</p> <p>This advice note was listed in the EIA Scoping Report in 2019 as one of the pieces of guidance that would be used to assess the setting impacts.</p> <p>HE would expect to see the first four steps undertaken in the Applicant's assessment of the assets listed.</p> <p>Step five will be undertaken through the process and at the end of the development as it may be helpful in reviewing the impacts and documenting them to inform similar schemes. The ES and Draft DCO does not provide any information about how step five may be recorded. Any settings assessments should be submitted to the HER. An assessment of the development on the heritage assets should be part of the monitoring of effects through any Management Plans submitted post-construction. This could be secured through a requirement in the DCO or as part of any post construction CEMPS. We can agree with National Highways the best way to secure this through the EMP.</p> <p>The table produced as 6.4 ES Appendix 6.1 Designated Assets: Value (Sensitivity) describes the assets their setting and their value (sensitivity) this equates to Steps 1 and 2. Steps 3 and 4 are then included within Chapter 6 (6.9, 6.10 and Table 6-6).</p> <p>In relation to Table 6-6 there are some entries where steps 1 - 4 have not been fully undertaken and/ or it is difficult to identify where steps 1-4 have been</p>
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		<p>addressed between Chapter 6 and Appendix 6.1. Although there are issues with the descriptions and settings assessment in most cases we agree with the nature, and magnitude of the impact and the significance of effect.</p> <p>In relation to Table 6-8 again we agree with the outcomes but the Table does not include:</p> <ul style="list-style-type: none">• all of the Non-Designated Archaeology within the DCO Boundary as depicted on ES 2.12 Heritage Designations Plans.• all of those resources identified in the Archaeological Assessment.• An updated version to include all the sites found in the trail trenching (Appendix 6.5). <p>Sites missing from the Archaeological Assessment (Appendix 6.2) include:</p> <ul style="list-style-type: none">• 39 Milestone (Gloucestershire Historic Environment Record (GHER) 13139)• 105 Mesolithic microlith found near Shab Hill (GHER 13043)• 116 Possible Long Barrow (GHER 35060)• 121 Scatter of Roman-British Pottery (GHER3810) close to Roman site in Area 2 Field B (Location reference from Appendix 6.5 Trial Trenching Report)• 132 Prehistoric and Romano-British cropmarks (NMR 1399006), now known to include an Iron Age cross-dyke (Area 2 Field D)• 175 Rectilinear cropmark (GHER 14846). Not identified through Trial Trenching (Appendix 6.5).• 248 Cropmarks west of Harding's Barn (GHER 4321)• 252 Milestone (GHER 9869)• 253 Iron Age Enclosure, linear and pits (GHER 4698) <p>Some other sites that should have been added after the trial trenching and using Historic England's own knowledge:</p>
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		<ul style="list-style-type: none">• Cowley Roman Settlement (GHER 5758, Area 2 Field G)• Prehistoric and Roman site near Brockworth (Area 1)• Prehistoric Enclosure northeast of Emma's Grove (GHER 22451/3815 Area 6 Field A)• Birdlip WWII Repeater Radio Station (Area 6)• Roman Burial (Area 2 Field A)• Iron Age Cross Dyke (Area 2 Field D) <p>b) and c) HE have identified issues with some of the setting descriptions and nature of impacts, see below, but we agree with the magnitude of effects and significance of effects.</p> <ol style="list-style-type: none">1. Coberley Long Barrow – Setting – no discussion of relationship to other long barrows in the area (Crippets to the west and West Tump, which is further south and outside the DCO study area). The barrows location overlooking Coldwell Bottom is not mentioned. Coldwell is a shallow valley which has tufa springs. Long Barrows are often associated with water. Its location over-looking the Churn is included in the scheduling description. It is not included in the settings assessment in Chapter 6, although it is mentioned in Appendix 6.1 Table 1-1 Description of Asset.2. Crickley Hill Camp– Setting – The relationship between Crickley Hill Camp to Peak Camp is not discussed under Setting and is not mentioned in Appendix 6.1 but it is mentioned under Nature of Impact in Table 6-6.3. Peak Camp is a Neolithic enclosed settlement in a similar landscape location to Crickley Hill Camp. It was occupied at the same time as Crickley Hill and is of High Value due to its age and rarity. The Camp did not develop into an Iron Age settlement so will have better preserved Neolithic remains with no later intrusions.
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		<ol style="list-style-type: none">4. The Setting description also does not mention the Post-Roman phase of occupation at Crickley Hill Camp. This is a significant phase as it contributes towards the understanding of the end of the Roman Empire and emergence of British territories prior to the Saxon invasions. The findings during the evaluation east of Shab Hill Barn of some post-Roman and possible Saxon occupation (Appendix 6.5, pp32-35 Area 2 Field B) may be linked to that on Crickley Hill.5. The current experience of the monument includes the views over the vale along the A417 across to Peak Camp and Emma's' Grove Barrows. That experience is impacted on by the noise from the current road, especially on the southern side of the camp. There is no mention of this within Table 6-6 or Appendix 6.1. The Noise assessment for Crickley Hill was voided due to high winds and the summary in Chapter 11 Appendix 11.2 – Baseline Noise Survey Results, 2.6 p.vii states 'noise climate dominated by A417. In Chapter 11, the change in noise caused by the scheme is assessed as being not significant. There is therefore no real change to the current situation (6.2 ES Chapter 11, 11.10.96). The site will still be impacted by a high level of noise from the road. This means there is no enhancement or reduction in the harm caused by the noise.6. The widening of the current road below Crickley Hill from a two lane, with crawler lane to a four-lane dual carriageway, with crawler lane, will also increase the visual impact of the road on the resource. Currently the road is well screened by the topography and the mature trees either side of the road. It is clear from the visualisations even at 15 years the road will be very visible from the southern side of the monument (6.3 ES Figure 7.10 - Photosheets and Visualisations - Part 3 of 8 Image 28 of 92). The introduction of vehicle movement as well as no reduction in noise levels will cause harm to the significance of the monument.
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		<p>7. Crippets long Barrow – Setting – the description states there will be long views to the north. The barrow lies just below the crest of a hill with views to the south and west. The ZTV clearly shows that the road would be visible from the site looking to the south. (6.3 ES Figure 7.1 and 7.2 just north of Viewpoint 17). There is no mention of the other long barrows (Coberley and West Tump) or its relationship with the Neolithic settlement on Crickley Hill. There is no mention of its association with the springs to the west, most long barrows have an association with water.</p> <p>8. Three Bowl Barrows known as Emma’s Grove Barrows – Setting – The Setting does not include an assessment of the contribution the topographic location makes to its significance. The barrows are located on southern side of a dry valley leading up from Vale to Wold and now the route of A417/A436. They overlook a tufa spring and a former Holy Well (St Catherine’s Well, marked on the Tithe Maps, but gone by the 1st Edition OS) to the east. It is thought that barrows are placed in the landscape in areas that have unusual landscape features, to make them stand out and to have them associated with special places. No mention of the reduction in noise is made although this is implied with the removal of the current A417. The association with other now lost Barrows as part of a group along the scarp edge (Barrow Wake) is not mentioned. The current level of noise from the A417 that you experience when visiting the barrows is not described. Crickley Hill Camp had Bronze Age occupation and these barrows may hold the remains of peoples who occupied the site. They are clearly visible from the Camp.</p>
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<p>1.7.10</p>	<p>Assets Affected</p> <p>The Applicant states that of the 36 resources that lie within the DCO Boundary described in ES Appendix 6.2 Archaeological assessment [APP-341], 18 would be directly impacted by the scheme. Of the 219 non-designated resources that lie outside of the DCO Boundary, an adverse effect would occur at two assets. Do you consider that any assets have been mis-graded by the Applicant or should be included as being either directly or adversely affected?</p>	<p>The numbers in the ES appear to be incorrect as there are only 11 sites listed in Table 6-8 not 18. At 6.7.10 the ES Chapter 6 states there are 116 heritage resources within the DCO boundary. These 116 sites are not identified anywhere in the Chapter or its appendices. The Figure referred to (Figure 6.3 ES 6.2 Non-designated heritage assets) is not to a scale you can read easily and does not have the reference numbers from the Archaeological Assessment.</p> <p>The Plans in ES 2.12 Heritage Designation Plans is to a legible scale and the heritage resources are clearly marked and they are numbered. Although 36 resources are identified in Chapter 6 there are 37 resource marked within the DCO boundary on the plans. It is unclear where or what the other 79 resources are that are said to be within the DCO boundary.</p> <p>Table 6-8 also does not include Cowley Roman Settlement (GHER 5758) or a Prehistoric enclosure north east of Emma's Grove (GHER 22451/ 3815) These were omitted from the Archaeological Assessment and previous versions of the PEIR. During pre-application consultation Historic England raised both sites as being potentially important. This omission was identified by us in our response to the PEIR consultations on 8 November 2019 and 12 November 2020 and also through discussions and e-mail correspondence. Cowley Roman site is mentioned in the ES Chapter at 6.10.14 bullet point 3, but this is a brief summary of the evaluation and not an assessment of its significance.</p> <p>Roman settlements where they retain reasonable archaeological potential are deemed to be of National Importance (Paragraph 4.2 Scheduling Selection Guide Settlements to 1500, Historic England 2018). The results of the 1996-7 excavation when considered alongside the metal detecting finds (the majority of finds have been recorded over the past 6 years) and the more recent trial trenching (Appendix 6.5) show clearly that the Cowley Roman Settlement holds reasonable archaeological potential. There are buildings that have been rebuilt a number of times and there is clear evidence of the development of the</p>
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		<p>settlement over time. There are also earlier phases which are partially covered with colluvium (hill-wash) ensuring a greater potential for survival of remains.</p> <p>The repeated omission of the Cowley Roman Settlement from the documentation has meant that its full significance has not been properly assessed. The site as a Roman roadside settlement is of national importance so is of high value. The new road and junction at Cowley roundabout with associated attenuation ponds and earthworks will remove most of the archaeology within the DCO boundary. This is a permanent major adverse effect.</p> <p>The Prehistoric enclosure north east of Emma's Grove was identified by a geophysical survey in 2003 (GHER 22451/3815). The recent trial trenching work (Appendix 6.5 Trench 39, pp.20-22) confirmed it was Iron Age in date and showed it was a well-preserved site with part of the defensive bank surviving as well as the in-filled ditch and internal features (pits and postholes). Although it is unclear what this site is, its age, rarity, well-preserved condition and potential to increase our knowledge of this period would all fit the criteria for scheduling (DCMS Scheduled Monuments & nationally important but non-scheduled monuments Policy Statement 2013, Annex 1)</p> <p>These two sites are however fully identified within the DAMS/OWSI and both areas will be mitigated by full-excavation and investigation prior to construction. It is the view of HE that this impact, despite their omission from the ES, will be appropriately mitigated by excavation and investigation prior to construction as agreed in the DAMS/OWSI. HE would seek to secure implementation of the DAMS/OWSI through a DCO requirement.</p> <p><u>Assets outside the DCO Boundary</u> We agree that 219 resources were identified outside of the DCO boundary in the AA. We also agree that two assets are affected, and we agree with the</p>
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		<p>identification of those two assets. Although we agree with the figures as they are in the AA we are not confident that this is accurate or reflects the current situation as the DCO boundary has been altered since it was written. We also have concerns as other numbers within Chapter 6 are incorrect (see above).</p> <p><u>Mis-graded Asset</u> Peak Camp (GHER 4754), although mentioned within Chapter 6, it is missed off the mapping (ES 2.12 Heritage Designations Plans). At 6.10.9 it is stated to be a resource of Medium value. The site as a Neolithic settlement is reckoned due to its rarity to be of national importance and schedulable (Paragraph 4.1 Scheduling Selection Guide Settlements to 1500, Historic England 2018). Because of this it is of high value.</p> <p><u>Other Assets</u> No other assets outside the DCO boundary need to be included in our opinion that would be directly or adversely affected.</p>
1.7.15	<p>Group Value</p> <p>a) To understand your Relevant Representation [RR-047], explain what is meant by: “the harm caused should be assessed within the holistic historic landscape not just as individual assets.”</p> <p>b) Is there a case for assigning a ‘Group Value’ to the assets because they share a communal wider setting</p>	<p>a) Within the ES, some of the resources were assessed as individual resources; but if they were taken as a group and their location within the landscape and relationship to other sites factored into account they would have been of higher value.</p> <p>For example, there is a concentration of Roman activity immediately southwest of Cowley Roundabout, with over 60 individual coin and brooch finds from a small area. The finds are immediately adjacent to Ermine Way Roman Road and in a shallow dry valley on the edge of Nettleton Bottom. The valley would have made a suitable routeway from the lower land around Brimpsfield up to the higher wold. In HE's view this supports the Roman settlement evidence from previous archaeological evaluation work. A high concentration of coin finds may also indicate a shrine/ temple.</p>



		<p>Another example are the Barrows (Crippets Long Barrow, Coberley Long Barrow, West Tump Long Barrow and the bowl barrows at Emma's Grove and Crippets) that should be looked at as a group associated with the Neolithic and Bronze Age settlement in the camps. Although we have lost barrows here through quarrying; the Emma's Grove Barrows (EGB) have survived and we have a Roman cremation close by (Appendix 6.5 Area 2 Field A p31). So there is a continuation of usage for burial in this area, on the edge of the scarp overlooking the valley and vale.</p> <p>The Neolithic and Iron Age activity recorded in the area will relate back to the landscape and Crickley Hill Camp and Peak. Camp Their significance is raised due to this association.</p> <p>When being assessed for scheduling the group value of sites is one of the Principles of Selection for Scheduled Monuments (DCMS 2013 Annex 1). Under Group Value it states that 'The significance of a single monument may be greatly enhanced by its association with related contemporary monuments and /or those of different periods'. In Historic England's Scheduling Selection Guides there is always a section on Group Value and how this contribute to the significance of an asset (for example paragraph 3.4, Settlements to 1500, HE 2018). When we assess a site for scheduling one of the principles we look at is the group value and if this contributes to the significance of the asset.</p> <p>b) HE's view is that there is a case to be made for assigning Group Value to associated monuments for the following, as per the above explanation:</p> <ul style="list-style-type: none"> • long barrows and the Neolithic Camps; and • round barrows and Bronze Age settlement at Crickley Hill Camp.
1.7.17	<p>Trial Trenching a) Are Historic England satisfied with the Applicant's conclusions and confidence derived from the trial trenching as stated at paragraph</p>	<p>Historic England are not satisfied that this is the case. To be able to have a high degree of confidence that the archaeological potential is understood this needs to be supported with a range of baseline information, not just the Trial Trenching. As stated in Baseline Scenario in DMRB LA106 3.8 – 3.9.1 this would include:</p>



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<p>6.7.42 of Chapter 6 [APP-037] such that they conclude 'there is a high degree of confidence that the archaeological potential within the DCO Boundary is understood to the degree required for an appropriate impact assessment to be carried out, and for comprehensive mitigation to be designed'?</p> <p>b) If not please explain why and set out your position.</p>	<ul style="list-style-type: none">• Desk-based assessment;• Geophysics; and• Archaeological Field Evaluation. <p>From our first meeting with NH on 22 June 2017 and in all subsequent correspondence we have outlined the need for these surveys and other baseline information to be included in the ES and to form the basis of any assessment</p> <p>The baseline information should be sufficient to allow a full understanding of the potential, character and significance of the heritage resources. CIFA 2020 Standard and guidance for archaeological field evaluation states that:</p> <p>The purpose of field evaluation is to gain information about the archaeological resource within a given area or site (including its presence or absence, character, extent, date, integrity, state of preservation and quality), in order to make an assessment of its merit in the appropriate context, leading to one or more of the following:</p> <ol style="list-style-type: none">a. the formulation of a strategy to ensure the recording, preservation or management of the resourceb. the formulation of a strategy to mitigate a threat to the archaeological resourcec. the formulation of a proposal for further archaeological investigation within a programme of research <p>The trial trenching report within the ES (6.4 appendix 6.5 trial trenching) has not fully addressed a, and thus information is lacking to complete b and c.</p> <p>Although we no longer require a percentage of trenching, our advice states the amount of evaluation work undertaken should be proportionate to the importance of the site affected and the impact of the proposed development on its significance (Preserving Archaeological Remains 2016, paragraph 1.1).</p>
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		<p>The evaluation for this scheme covered about 1% of the overall DCO boundary. It showed that the geophysical work could be relied upon to identify large cut features (ditches, pits, wall lines). Smaller pits, post-holes and burials were not identified, for example in Trench 282 (Fig 50) and 285 (Fig 51 and 29). These 2 trenches have a series of pits, post-holes and ditches which do not show clearly on the geophysics. They cover an area of about 50m diameter. The features are dated to the prehistoric period but are not firmly dated. So the smaller prehistoric sites consisting of a few post-holes and pits could be easily missed. These sites are important in understanding the use of the land in the pre-Iron Age landscape (Mesolithic, Neolithic and Bronze Age) and linking that activity back to the occupation on Crickley Hill Camp and Peak Camp.</p> <p>Our position is that as insufficient evaluation work was undertaken to understand the extent and significance there will need to be extensive archaeological mitigation within the DCO boundary where impacts are identified. We are concerned that the 9-month period identified for this within the EMP (Annex C DAMS/OWSI 3.7.13) will not be sufficient to excavate all the sites, as there may be double the number of sites currently identified.</p> <p>To ensure that the work needed to fully record and understand the archaeology that will be removed by this scheme we are working with NH and their Consultants to agree a final version of the DAMS/OWSI. We were sent a revised version of this 22 November 2021. The DAMS is now supported with Mitigation plans showing areas of excavation (blue), Strip map and sample (orange) and protection (yellow). The areas are based on the evaluation results. Areas that had no geophysics and or trial trenching are currently identified to be Stripped, mapped and sampled.</p> <p>The DAMS OWSI needs further revision to ensure all the archaeological resources that will be impacted by the scheme are properly recorded and</p>
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		understood. We are working with NH and the County Archaeologist through the examination via meetings and e-mails to review and revise the document.
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