



SUMMARY WRITTEN REPRESENTATION

ON BEHALF OF THE

**HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND
(HBMCE)**

(HISTORIC ENGLAND)

Application by

National Highways for an Order granting Development Consent for the A417 Missing Link Scheme

PINS Reference No. TR010056

HBMCE Reference NO. PL620663

Deadline 1: 14th December 2021

- 1.1. In its Relevant Representation to PINS dated 2 September 2021 HE outlined the following areas of concern in relation to the proposed Scheme;
 - Impacts on Designated Heritage Assets
 - Understanding of undesignated Heritage Assets
 - Proposed enhancement of Emma's Grove Barrows and lack of proposed enhancement of Crickley Hill Camp.
 - Limited understanding of wider construction and mitigation impacts on the archaeology.
- 1.2. HE is of the view that the potential impact upon the archaeological record was ??? adequately assessed prior to submission of the ES (including the Archaeological Assessment missing key sites, the omission of a full Desk-Based Assessment, limited geophysics and evaluation and no geo-archaeological investigations).

NSPNN 5.127 provides that

" The applicant should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant Historic Environment Record should have been consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation.

DMRB LA106 Baseline scenario 3.8-3.9 outlines the basic information needed and refers to Chattered Institute for Archaeologists (CIfA) Standards for that work.

- 1.3. The lack of pre-determination evaluation and survey of the archaeological resource means that there is a large amount of work to be undertaken post-consent and pre-construction. The timescales for this need to be sufficient to allow proper investigation and analysis of the results to allow the County Archaeologist and HE to assess the harm to the archaeology and provide informed advice on suitable mitigation.
- 1.4. HE is also concerned that post-consent there may not be sufficient time to undertake all the recommended archaeological mitigation work, allowing proper assessment of the nature and significance of archaeological remains and the impact upon them. This point is currently being discussed with the Applicant to ensure appropriate mitigation is agreed and provided through the DAMS/OWSI
- 1.5. 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. HE recognises that further baseline information, in the form of a full desk-based Assessment or more trial

trenching, will not be undertaken and Chapter 6 will not be rewritten or updated. 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").

- 1.6. As part of the DAMS/OWSI there will be a requirement for SSWSIs to be provided. HE will require these to be secured through an appropriate DCO requirement. This is currently being discussed with the applicant and hope this can be resolved during the examination period.
- 1.7. HE agree that the impact of the Scheme on the scheduled monument of Emma's Grove Barrows is moderate adverse as stated in the ES (6.12.1). However HE does not agree that the impact is only a construction impact, the change to the setting is a permanent impact so is also an operational effect.
- 1.8. HE is of the view that the identified management and enhancement proposed for Emma's Grove Barrow is not sustainable and will not provide long-term improved management. The proposed enhancement seeks to remove scrub and trees from the three barrows and transplant calcareous grassland on to them. There will then be 2 narrow viewing corridors cut through the trees to open up some views to the west and southwest. Based on our previous experience with clearing the barrows and leaving them as a glade this has not been a sustainable way to manage the barrows. They very quickly became overgrown without regular clearance of the scrub and tree regrowth. HE would like to see the whole of the scheduled monument area to be cleared of scrub and trees and for the site to be incorporated into the calcareous grassland proposed for the field to the east. This will ensure the management of the barrows under grassland is sustainable. For the monument to be removed from the Heritage at Risk Register the current management issues need to be addressed and a long-term strategy put in place to manage the site under calcareous grassland. The NSPNN 5.130 states that "The Secretary of State should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities"
- 1.9. It is HE's view that the impact on the setting of Crickley Hill Camp is harmful but that it is not substantial harm. The new road will impact on the setting of the monument which contributes to its significance, through additional vehicle movements being visible and with no decrease in noise levels. We would like to see further work undertaken to reduce the visual impacts and reduce the noise levels to improve the experience of the monument. The lack of any enhancement proposed for Crickley Hill Camp is a concern and further discussions with National Highways is needed to explore opportunities to reduce the noise and road impacts on the high value designated heritage asset. This position is supported by National Trust.

- 1.10. HE will continue to discuss those matters yet to be agreed as part of a positive, constructive dialogue with the Applicant, in the interests of identifying solutions to the outstanding issues identified in its Written Representation.