

A417 Missing Link DCO

Joint Councils comments on National Highways
Deadline 2 submission

Gloucestershire County Council, Cotswold District Council,
Tewkesbury Borough Council

2 February 2022

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1. Introduction

- 1.1.1. Gloucestershire County Council (GCC), Cotswold District Council (CDC), and Tewkesbury Borough Council (TBC) 'the Joint Councils' are the three host authorities for the National Highways' (NH) A417 Missing Link DCO Scheme 'the Scheme'.
- 1.1.2. This document is the Joint Councils response to the submissions made at Deadline 2 on the 13 January 2022 by National Highways (NH) and Interested Parties (IPs).
- 1.1.3. This document is structured in the following way:
- Chapter 2, Table 2.1 – Responses to NH comments on responses to:
 - The Local Impact Report
 - The ExAs Written Questions
 - Leckhampton Hill Technical Note
 - Appendix 2.1 Environmental Management Plan
 - Appendix 2.1 EMP Annex B Construction Traffic Management Plan
 - Environmental Statement – Updates and Errata
 - Chapter 2, Table 2.2 – Responses to cultural heritage issues raised

2. Response to National Highways Deadline 2 submissions

Table 2.1 – Joint Councils response to National Highways Deadline 2 submission

Table ref	Document	Para. / Ref.	NH comment at Deadline 2	Joint Councils response at Deadline 3
Comments on the Local Impact Report				
2.1.1	8.12 Comments on Local Impact Report (Deadline 2)	Paragraph 4.2.3	Paragraph 3.2.3 and Paragraph 3.2.6 of the LIR refer to the Joint Councils' concerns regarding air quality impacts during construction on Air Balloon Cottages. Please refer to the National Highways response to ExQ1 Questions 1.2.9 and 1.2.11 (Document Reference 8.4, REP1-009) for further information on this.	See the Joint Councils' comments on responses to ExQ1.2.11 submitted at Deadline 2 [REP2-034].
2.1.2	8.12 Comments on Local Impact Report (Deadline 2)	Paragraph 4.2.4	Paragraph 3.2.5 of the LIR refers to the Joint Councils' concerns regarding air quality impacts during operation on Ullen Wood. Please refer to the National Highways response to ExQ1 Question 1.3.7 (Document Reference 8.4, REP1-009) for further information on this.	The Joint Councils also recommend that monitoring is undertaken before opening to obtain baseline information with which the post opening data can be compared.
2.1.3	8.12 Comments on the Local Impact Report	Paragraph 4.7	<p>Paragraph 3.7.3 of the LIR identifies a concern that ES Chapter 10 Material Assets and Waste (Document Reference 6.2, APP-041) does not include the volume of material currently known to be surplus to the cut/fill balance in the waste assessment.</p> <p>Paragraph 10.9.10 of ES Chapter 10 Material Assets and Waste (Document Reference 6.2, APP-041) sets out the measures proposed to reduce excess material to the point that no surplus material will remain, including:</p> <ul style="list-style-type: none"> • Highway alignment changes to reduce cut volumes. • Changes to landscape earthworks cross section and slope design to increase placed fill volumes. • Changes to cut slope design and cross sections at locations in deep cutting to reduce cut volumes. • Utilisation of excavated limestone materials in pavement construction. <p>The concern raised in paragraph 3.7.3 of the LIR is one that the Joint Councils have also raised in their Written Representation (REP1-135) and through matter 10.1 in Table 5-1 of in the most recent iteration of the Statement of Common Ground with the Joint Councils in Appendix A of the Statement of Commonality (Document Reference 7.3 Rev 1, REP1-006). National Highways has provided a response to that concern in the Statement of Common Ground...</p>	<p>In its response, National Highways refers to its position set out in Appendix A of the Statement of Common Ground [REP1-006]. This matter remains a matter outstanding as the Joint Councils do not accept this position and continue to request that the ES Chapter 10 assessment is updated to include an assessment of the identified surplus material in order to assess the worst case scenario and fulfil the requirements of DMRB LA 110 Section 3.11 and 3.12.</p> <p>The Joint Councils feel the measures are enhancement measures as they are only proposed (rather than embedded or essential mitigation) and that the assessment should not be based on them.</p>
2.1.4	8.12 Comments on the Local Impact Report	4.9.3 4.9.4	<p>Paragraph 3.9.21 of the LIR states:</p> <p><i>"NH has made a commitment to agree the design details of new sections of PRoW and permissive paths to be created, including surface treatments, signage and fencing with the local highway authority; however, there appears to be no securing mechanism in the dDCO [APP-022] for any such arrangements relating to the structures required to carry paths over the A417. The Joint Councils recommend the dDCO include a requirement on NH to consult with prescribed consultees prior to submission for written approval from the Secretary of State of the details of design of new sections of PRoW and permissive path, including any structures required to carry those ways across the A417 carriageway."</i></p> <p>In response to this point, National Highways refers to commitment PH1 in Table 3-2 Register of Environmental Actions and Commitments (REAC) in ES Appendix 2.1 EMP (Document Reference 6.4 Rev 1), which commits to the implementation of the mitigation and enhancement measures detailed in ES Appendix 2.1 Annex F Public Rights of Way (PRoW) Management Plan (Document Reference 6.4, APP-323). The PRoW Management</p>	<p>The response provided by National Highways does not address the point of concern raised by the Joint Councils. The detailed position of the Joint Councils on the lack of preliminary design information for key elements of the Scheme within the application and the lack of any Requirements securing the Secretary of State's written approval for detailed design of structures is well set out at Deadline 1 the <i>Local Impact Report</i> [REP1-133], <i>Written Representation</i> [REP1-135], at Deadline 2 in the <i>Joint Councils comments on the Deadline 1 submissions made by National Highways and Interested Parties</i> [REP2-034] and in Issue Specific Hearings 1 and 2, as summarised at Deadline 3 in the Joint Councils <i>Written Submission of case put orally at the Hearings held the week commencing 24 January 2021</i> and Appendix A of that document.</p> <p>The Joint Councils request the ExA and National Highways review the evidence submitted at Deadline 3 in the Joint Councils <i>Written Submission of case put orally at the Hearings held the week commencing 24 January 2021 Appendix A Detailed Design in DCOs Case Studies</i>.</p>

Table ref	Document	Para. / Ref.	NH comment at Deadline 2	Joint Councils response at Deadline 3
		4.12.5	<p>Plan sets out that details of surfacing, signage and enclosures are for the detailed design stage of the scheme.</p> <p>Comments on detailed design (LIR paragraph 3.12.4) are addressed under comments on the Landscape and Visual Effects above (part 4.4 of this document).</p>	
2.1.5	8.12 Comments on the Local Impact Report	4.10.2 and 4.10.3	<p>In response to paragraph 3.10.10 of the LIR the Applicant would note that the disapplication of section 32 of the Land Drainage Act 1991 – to which Article 3(1)(f) of the dDCO refers – it is not a “prescribed consent” which requires the relevant authority’s agreement for it to be disapplied pursuant to section 150 of the Planning Act 2008. Section 23 of the Land Drainage Act 1991 – to which Article 3(1)(e) of the dDCO refers is a prescribed consent for such purposes. It is thought that the Council’s comment at 3.10.10 of the LIR may be intended to refer to that latter consent referred to at 3(1)(e) of the dDCO.</p> <p>The Applicant has met with GCC and requested that it provide a list of details that it anticipates may be required for its approval to the disapplication of section 23 Land Drainage Act 1991. The Applicant is committed to securing GCC’s consent to the disapplication of that provision, and will provide the Examining Authority with an update in due course.</p>	<p>The Joint Councils note the error identified by National Highways in the paragraph 3.10.10 of LIR [REP1-133]. To clarify, the Joint Councils request at Deadline 1 was for Article 3(1)(e) to be revoked. Article 3(1)(e) would disapply s23 of the Land Drainage Act and remove the requirement for National Highways to seek Ordinary Watercourse Consents. S23 of the Act is a prescribed consent.</p> <p>This concern has been raised to National Highways in the Joint Councils legal review of the draft DCO. The underlying concern is that the designs of watercourses - which have been informally agreed with the Lead Local Flood Authority in 2021 - may be subject to changes prior to their construction if the designs are not secured within the DCO. There would be no requirement for National Highways to consult the LLFA prior to design alterations and this could lead to changes in environmental impacts that might not be adequately, independently assessed by the LLFA.</p> <p>The LLFA has advised that the details National Highways has already shared and the LLFA has informally agreed to could be submitted to support ordinary watercourse consent applications. This would make the process of gaining the necessary consent a simple formality.</p> <p>The Joint Councils are in ongoing discussions with National Highways on this matter and hope to resolve the issue through a legal agreement.</p>
2.1.6	8.12 Comments on Local Impact Report	4.11	N/A	<p>National Highways has not responded to the Joint Councils comments on the need for mitigation of carbon emissions associated with the construction of the scheme. The Joint Councils request the Examining Authority consider paragraph 3.11.8 of the LIR [REP1-133].</p>
2.1.7	8.12 Comments on Local Impact Report	4.12.8	<p>National Highways does not consider that a prescribed consultation period under Requirement 4 is necessary or appropriate, and that the introduction of such a requirement would cause undue delay.</p>	<p>The Joint Councils are seeking a defined consultation period to assist in avoiding delays to National Highways.</p> <p>Resource demand in local authorities is well documented. The Joint Councils will do their best to respond to requests for consultation comments as soon as it is able to; however, this is not always possible within the desired timeframes of the development.</p> <p>A defined consultation period would ensure the Joint Councils are given sufficient time to coordinate and respond meaningfully to requests for comments. This would ensure NH has a consultation response from the Joint Councils to present to the SoS (in accordance with Schedule 2 Part 2) but also would provide greater certainty to NH’s delivery programme. Although NH currently has clear communication links with the Joint Councils and we understand they have a standard process for sharing information, it is not clear if this would apply to NH’s Contractors and has not been shared with the Joint Councils.</p> <p>A 21 day consultation period should be set out in Requirement 4 or Part 2 of Schedule 2 of the dDCO, or could be dealt with in a side agreement.</p> <p>The Joint Councils require greater reassurance that it will be afforded sufficient time to review and provide comments on information prepared to discharge Requirements that it is prescribed consultee for. It is concerning that NH considers 21 days an unacceptable length of time and the Joint Councils question whether without a defined period of 21 days National Highways might seek responses in a shorter, less reasonable timeframe.</p>

Table ref	Document	Para. / Ref.	NH comment at Deadline 2	Joint Councils response at Deadline 3
Comments on Responses to Examining Authority's Written Questions				
2.1.8	8.13 Comments on Responses to Examining Authority's Written Questions	1.1.19	The methodology for carrying out the engagement with the public as part of the future update of ES Appendix 2.1 Environmental Management Plan (EMP) (Document Reference 6.4 Rev 1) will be discussed and communicated by National Highways with the Joint Councils, and other stakeholders as appropriate, following its appointment of a contractor which is required to help inform the detailed design stage of planning (should the scheme be approved to proceed to construction). Table 2-1 of the EMP defines the responsibilities associated with construction that the contractor must establish and maintain. We will work with stakeholders, including the Joint Councils, to inform the activities of the Contractor Community Relations Manager (CRM) (Table 2-1, EMP) through the project's long-standing Communications Technical Working Group.	<p>The Joint Councils acknowledge the new REAC measure GP8 included in the EMP update submitted at Deadline 2 [REP2-006 and REP2-007]. However, the Joint Councils do not see any reference to a Community Engagement Plan that we would expect to be consulted on as outlined in our response to ExQ1 1.1.19 submitted at Deadline 2 [REP2-034].</p> <p>The Joint Councils welcome future updates of the EMP which will outline the methodology for carrying out the engagement with the public.</p>
2.1.9	8.13 Comments on Responses to The Examining Authority's Written Questions (ExQ1) (Deadline 2)	1.2.11	National Highways has no further comments to make, further to our submission in Responses to the Examining Authority's Written Questions (Document Reference 8.4, REP1-009).	See the Joint Councils' response to ExQ1 at 1.2.11 submitted at Deadline 2 [REP2-034].
Leckhampton Hill Technical Note				
2.1.10	8.15 Leckhampton Hill Technical Note	N/A	N/A	<p>The Technical Note contains an updated analysis of the predicted 'do-minimum' and 'do-something' traffic flows on Leckhampton Hill for the revised forecast years of 2026 and 2041 taking account of the latest scheme design refinements as requested by the Joint Councils. However, the technical note provides no analysis or discussion of potential measures to mitigate the impact of the predicted increase in traffic flows on Leckhampton Hill.</p> <p>Given the closeness of the predicted journey times of the alternative routes to/from the A417 and Cheltenham via either Leckhampton Hill or the A435, modelled route choice between the two alternatives will be highly sensitive. GCC has expressed concerns about the suitability of Leckhampton Hill to cope with the forecast additional traffic with the A417 Missing Link Scheme in operation (see Local Impact Report and Written Representation). The Joint Councils consider it necessary for National Highways to investigate potential options for achieving a reduction in the predicted increased traffic on Leckhampton Hill in favour of traffic using the A435. Suggested measures to be considered include capacity or speed reduction on Leckhampton Hill or a signing strategy.</p>
Appendix 2.1 Environmental Management Plan				
2.1.11	6.4 Appendix 2.1 Environmental Management Plan (Deadline 2) (Tracked)	AQ14, Table 3-2	Air quality monitoring would be undertaken at appropriate locations to determine emissions during operation of the scheme and confirm the impact on Ullen Wood Ancient Woodland and veteran trees. Monitoring would be undertaken for 1 year from the first full year of operation. Should monitoring identify poorer air quality, remedial action would be required.	The Joint Councils also recommend that monitoring is undertaken before opening to obtain baseline information with which the post opening data can be compared.
Appendix 2.1 EMP Annex B Construction Traffic Management Plan				
2.1.12	6.4 (Rev 1) Appendix 2.1 EMP Annex B Construction Traffic Management Plan (Tracked)	1.1.2	<p>In developing this Traffic Management Plan, consideration has been given to the following five key areas outlined in the major project dynamic roadworks vision statement:</p> <ul style="list-style-type: none"> Varying the speed limits so they are appropriate to the work taking place. Shortening the length of the roadworks. The design has been developed so that the majority of the scheme is offline, with traffic management confined to the junction tie-ins and the existing A417 up Crickley Hill. Appropriate use of full road closures and associated diversions. Delivering road works quicker. 	The updated CTMP does not address concerns raised by the Joint Councils (Section 2.1 of REP1-135, para 3.1.18 of REP1-133, 1.11.20 in REP1-134 and 2.1.3 of REP2-034) and other Interested Parties regarding the effects of construction traffic on the local road network. The Joint Councils consider that a key purpose of the CTMP should be reducing the impact of construction on the local road network and this should be reflected by its inclusion in paragraph 1.1.2 of the CTMP and updates to the CTMP to secure appropriate measures to mitigate impacts of construction traffic on local roads.

Table ref	Document	Para. / Ref.	NH comment at Deadline 2	Joint Councils response at Deadline 3
			<ul style="list-style-type: none"> Explaining clearly what activities are or not taking place. 	
2.1.13	6.4 (Rev 1) Appendix 2.1 EMP Annex B Construction Traffic Management Plan (Tracked)	2.3.12	Liaison would be in place between the scheme and the Highways England Delivery Team, DBFO Contractor to identify future schemes or maintenance within the area so that interfaces can be successfully managed. Representatives of the scheme would attend working groups already established so that adjacent works can be integrated. Monthly TM meetings would also be held with all interested stakeholders (including police, ambulance, fire services).	GCC should be included in any liaison to identify future schemes or maintenance within the area and that GCC should be included in any Monthly TM meetings.
2.1.14	6.4 (Rev 1) Appendix 2.1 EMP Annex B Construction Traffic Management Plan (Tracked)	App F		<p>The two diversion routes set out in the CTMP are aimed primarily at dealing with rerouting strategic traffic movements during closures on the A417. GCC expects that more locally based traffic would divert onto nearby 'shorter' alternative rat-run routes. It is also likely that similar local diversions (traffic reassignment) will occur, although to a lesser extent, when temporary mitigation measures are in place at limited times during the 33 month construction works period e.g. those times when there are 40mph speed limits and restricted lane widths, 40mph speed limits and single lane widths, and 40mph speed limits and contraflow running. For confirmation of the likely impacts, it is therefore recommended that Highways England carry out indicative traffic modelling scenarios for the 2026 year of opening to assess/quantify local network traffic conditions during the scheme construction period when short-term A417 section closures, speed restrictions and lane width reductions are planned to be in operation.</p> <p>The CTMP should set out the details of appropriate mitigation measures to address any identified issues on local roads, for example details of a temporary signage strategy to be installed along the A435 to deter diverted traffic from using High Cross and the lanes through Cowley and Stockwell to access the A417.</p>
2.1.15	6.4 (Rev 1) Appendix 2.1 EMP Annex B Construction Traffic Management Plan (Tracked)	2.3.14	Road closures would not be undertaken during the Cheltenham Gold Cup Weekend and the Paddy Power Race Week.	This needs to be corrected to "Road closures would not be undertaken during the Cheltenham Gold Cup and the Paddy Power Race Weeks".
Environmental Statement – Updates and Errata				
2.1.16	6.7 (Rev 1) Environmental Statement – Updates and Errata (Deadline 2) (Tracked)	5.11.3	<p>New Paragraph 5.11.3 added for ES Chapter 5 – Air Quality:</p> <p>Air quality monitoring would be undertaken at appropriate locations to determine emissions during operation of the scheme and confirm the impact on Ullen Wood Ancient Woodland and veteran trees. Monitoring would be undertaken for 1 year from the first full year of operation. Should monitoring identify poorer air quality, remedial action would be required.</p>	The Joint Councils also recommend that monitoring is undertaken before opening to obtain baseline information with which the post opening data can be compared.

Table 2.2 – Joint Councils response cultural heritage issues raised

Table ref	Para. / Ref.	Joint Councils response at Deadline 3
2.2.1	2.1.4	The Joint Councils' concerns regarding the weakness of the assessment and evaluation undertaken in support of the DCO have not changed. The Joint Councils' primary concern is that the design stage and construction stage DAMS and OWSI will be fully robust.
2.2.2	2.1.5	The Joint Councils' concerns as to the scale of evaluation trenching so far undertaken remain. Even with good concordance with geophysical survey a 1% sample is inadequate within an archaeological landscape of this sensitivity. Concerns raised regarding the suitability of the geophysical survey followed by trenching approach in identifying potentially significant, but ephemeral archaeology of earlier prehistoric and early medieval date have also not been addressed.
2.2.3	2.1.7 – 2.1.9	The Joint Councils welcome the implementation of these surveys.
2.2.4	2.1.11	The Joint Councils have checked the HER data forwarded (24 th June 2019) to the appointed sub-contractor which undertook the archaeological assessment work, and can confirm that data on the Cowley Romano-British settlement was included, but was nevertheless omitted from the subsequent reporting in support of the DCO.
2.2.5	2.1.14	Although it may be the case that a full Desk Based Assessment (DBA) is not required by Design Manual for Roads and Bridges, it is nevertheless best practice for a robust technical appendix (at least of equivalence to a ClfA guidance standard DBA) to be prepared in support of a DCO, particularly in a landscape of this potential archaeological sensitivity.
2.2.6	Table 2.1	The Joint Councils welcome the inclusion of these errata requested by Historic England. The Joint Councils disagree that the record of a Mesolithic flint find need not have been included in the assessment as it had already been removed from the area. Even after removal a find of this nature could be a key indicator of the presence of ephemeral activity of this period.
2.2.7	2.2.2	The Joint Councils agree that total certainty of results could only have been achieved through a total strip to archaeological standards within the scheme boundary. The Joint Councils remain confident that a much greater degree of certainty could, however, have been achieved with a larger trenching sample and the implementation of additional survey methods more suited to identifying more ephemeral remains. Such methods as geochemical analysis, geoarchaeological assessment and deposit modelling, and sieving for artefact scatters have all been successfully deployed on similar schemes and areas of potential archaeological sensitivity including HS2, A303 (Stonehenge) and A66 cross Pennine dualling.
2.2.8	2.2.3	The Joint Councils welcome the commitment to deliver a DAMS and OWSI for the scheme. It is important that these overarching frameworks cover both the design and build stages and are fully robust.
2.2.9	2.2.4	The Joint Councils welcome the implementation of a geoarchaeological programme but will have concerns if this is only being undertaken through a watching brief on planned geotechnical works. A more archaeologically targeted approach with purposive geoarchaeological prospection to achieve adequate sample returns and dating should be implemented as part of the package.
2.2.10	2.2.10	The Joint Councils fully understand that there is a balance involved, but throughout consultation the actual methodologies utilised and trenching percentage were never up for discussion, despite the concerns clearly expressed. The Joint Councils' welcome this commitment to implementation of a strip map and sample approach to all land within the scheme boundary not already identified for full excavation. This is a much more appropriate response than watching brief.

Table ref	Para. / Ref.	Joint Councils response at Deadline 3
2.2.11	2.2.11	The Joint Councils remain concerned that the scale and methodology of the assessment and evaluation work undertaken in support of the DCO remains inadequate to properly assess the potential archaeological significances within the Scheme boundary, and as such introduces significant uncertainty and project risk.
2.2.12	2.4.2 – 2.4.3	The Joint Councils welcome this clarification with regard to project timetable and commitment to deliver the proposals within an agreed DAMS/OWSI. This will need to cover both the design and construction phases of the Scheme.
2.2.13	2.5.2 – 2.5.3	The Joint Councils contest that all archaeological predictive assessment must by definition be holistic in nature; taking into account an array of interlocking variables including geology, topography/landform, hydrology, palaeoenvironment, previous archaeological work, historic mapping, historic landscape assessment and drawing upon professional judgement and developed frameworks/models. In a 'landscape led' scheme within an area of such archaeological and historic landscape sensitivity a much more joined up approach might have been expected. The National Trust submission on historic landscape at Deadline 1 is an exemplar of this approach properly applied.
2.2.14	3.2.2 – 3.2.7	The Joint Councils note and, have seen both the HLC provided in support of the DCO for heritage and the LVIA chapter and have concerns that even these appear to have been 'siloed'. Between them these assessments still do not deliver the required level of analysis linking archaeology to features that still exist within the modern landscape such as trackways, parish boundaries, ancient woodland/wood pasture (how old for instance are the local beechwoods as human developed wood pasture/hunting and gathering resources?), possible ancient field systems, standing monuments (barrows, hillforts etc) and potential drovers' routes (the latter briefly mentioned in the LVIA but NOT in the Historic Landscape Assessment for heritage). Again, the National Trust submission for Deadline 1 is referred to as an example of what might have been achieved.
2.2.15	3.3	<p>The Joint Councils have made their position clear, in responses given above, and in Written Representations and other responses. It is for the Inspectorate to judge the heritage evidence available in support of the DCO application against the Joint Councils previously stated position as to whether requirements of NPSNN and EIA Regs have been fully met.</p> <p>The Joint Councils contest the responses in this section (3.3.1 – 3.3.17) on the basis of positions already outlined earlier in this response for Deadline 3 and Written Representation.</p>
2.2.16	3.3.5	<p>The HER data alone is a blunt tool of archaeological prediction that needs to be considered in association with other important variables such as topography, geology, hydrology and palaeoenvironment. The evidence for all periods prior to the Middle Bronze Age as well as parts of the early medieval period typically only survive as discrete artefact or minor feature clusters, often only within plough/topsoil on the thin redzinas of the Cotswold scarp. These will not have been evident (from casual finds in ploughsoils) within areas of historic pasture and are often totally missed by the typical approach of geophysical survey followed by trial trenching, even where trenching densities are higher than was undertaken in support of the DCO.</p> <p>Mesolithic and Neolithic activity is clearly represented in the local area with finds from the excavations at Crickley Hill and at least one find of Mesolithic date recorded from within the Scheme boundary recorded on the HER, but discounted within the archaeological assessment in support of the DCO. Further evidence for this period and the Neolithic was identified even within the limited trial trenching undertaken, much of it buried within and under colluvium (hillwash).</p>
2.2.17	3.3.6	The Joint Councils contend that only significant archaeology of c. Middle Bronze Age to Romano British date can be confidently predicted/identified from geophysical survey followed by trial trenching alone. Other techniques need to be deployed to model the largely ephemeral, but nevertheless still potentially very significant archaeology of

Table ref	Para. / Ref.	Joint Councils response at Deadline 3
		Mesolithic through to Early Bronze Age and early medieval periods. This evidence bias is well understood.
2.2.18	3.3.11	The Joint Councils refute the claim made here that the scope of the trial trenching (and other evaluative works) was <i>defined in consultation</i> with the County Archaeological team or Historic England. A Targeted 1% survey was all that was ever offered, despite the concerns raised throughout.
2.2.19	3.3.17	The Joint Councils welcome a commitment to constructive consultation to deliver the archaeological programme associated with the Scheme.
2.2.20	3.4.1 – 3.4.6	The Joint Councils have already responded to the points raised in these paragraphs earlier and above in this response and in the Written Representation [REP1-135].
2.2.21	3.4.7	<p>The Joint Councils point again to the characterisation developed by the National Trust as an exemplar of the historic landscape characterisation methodology that could have been used in support of the DCO. The methodologies utilised by HS2 despite being a much larger linear scheme still developed more nuance than is apparent in the characterisation delivered in support of the DCO. Study of historic mapping for instance was not just limited to historic Ordnance Survey, but also considered Tithe and Enclosure maps, where available historic estate maps and early County Mapping available from at least mid 18th century (i.e, Thomas Kitchin Map for Gloucestershire). Other sources, including early 20th century poetry (Ivor Gurney) and 18th century art guidance/travel guide by William Gilpin are also readily available for the Crickley Hill area.</p> <p>The Joint Councils also do not see why the 2007 Gloucestershire HLC (one of the earliest developed in the Country) is used in evidence in support of the approach taken whilst the Highways Agency's own guidance, also from 2007, (Assessing the Effect of Road schemes on Historic Landscape) was discounted.</p>
2.2.22	3.4.8	The Joint Councils welcome the errata included here with regard to the Peak. The Joint Councils do however support Historic England's premise (refuted by Highways England at 3.4.9) that the landscape in which the Peak, Crickley Hill and Emmas Grove (the latter both scheduled) should be considered as a uniform whole.
2.2.23	3.4.12 – 3.4.13	The Joint Councils welcome the commitments made to make a record of the Air Balloon Public House before its demolition.
2.2.24	3.4.18 – 3.4.19	The Joint Councils welcome the commitments being made with regard to public realm and outreach.
2.2.25	3.5.2 – 3.5.7	The Joint Councils position is that what was, and is required, is a purposive programme of geoarchaeological assessment and analysis undertaken by suitably qualified geoarchaeologists/palaeoenvironmental specialists. Not reference to other environmental disciplines the output of which, although having some bearing, are not specific to purely archaeological data retrieval and dating. Much is made in the Highways England response to the non changes to hydrology without addressing the concerns raised with regard to colluvium/hill wash, perched water tables and peat within landslips, importance of Tufa springs, and potential near surface waterlogging within the dry valley of the Churn Valley at Shab Hill.

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