



EAST OF ENGLAND OFFICE

A12 Chelmsford to A120 Case work Team  
By Email Only  
A12chelmsfordA120@planninginspectorate.gov.uk

Our ref: PL00753271  
Your ref: TR010060

07 March 2023

Dear A12 Chelmsford to A120 Case work Team

Re: ExA 1st written questions

Please find below Historic England’s comments to the responses from the applicant relating to ExA 1st written questions at Deadline 1.

Question Reference	Question	Historic England (HBMCE) response
11.0.1	<p>There are a number of archaeological remains, in and close to the Order Limits, which would be adversely affected by the construction of the Proposed Development. In addition, please provide more detailed justification for concluding moderate adverse residual effects from the Proposed Development on the archaeological remains [APP-074].</p> <p>Historic England and LAs to comment.</p> <p>-Applicant – what consideration has been given to the effect of the Proposed Development on all these remains combined?</p> <p>Are parties satisfied with the approach, scope and conclusions of the archaeological assessment, and proposed mitigation?</p>	<p>We note the applicant’s response to 11.0.1.</p> <p>The remit for detailed comment and advice on non-designated archaeological remains lies with the relevant Local Authority Archaeological Advisors and we would defer to their expertise on non-designated archaeological remains.</p> <p>We note concerns from Essex County Council that the impact of the scheme on Palaeolithic and palaeoenvironmental deposits has not been fully established. We note they consider further geoarchaeological investigation would be required to understand the impact of the scheme on Palaeolithic and paleoenvironmental remains which have potential to be of national significance. We would recommend this further work is undertaken in accordance with their advice.</p>





		We have also provided detailed comments on the scope and conclusions of the assessment, and proposed mitigation in Chapters 7 – 11 of our Written Representation (submitted 13 February 2023). We recommend these comments are addressed by the applicant and we would be pleased to provide further advice and guidance.
11.0.2	Historic England have noted (RR-043) that the information provided in the Archaeological Mitigation Strategy [RR-118] is of a high standard (chapter 7.10) and there has clearly been extensive consultation with the relevant Local Authorities. Are there any updates appropriate to the Strategy?	<p>We note the applicant’s response to 11.0.2.</p> <p>We have provided detailed comments relating to the Archaeological Mitigation Strategy in Chapter 11 of our Written Representation. We recommend these comments are addressed by the applicant and we would be pleased to provide further advice and guidance.</p> <p>We attended a meeting on 12 January 2023 to discuss A12 Chelmsford-A120 Widening Scheme Advanced Works WSI v1 12_12_2022 and provided comments about the WSI v1.</p>
11.0.3	<p>Specific reference is made to two Scheduled Monuments being the Neolithic Mortuary at Appleford Farm, Rivenhall and the moat at Marks Tey Hall.</p> <p>Are the Applicant and Historic England satisfied that adequate mitigation measures are proposed to safeguard these important assets?</p> <p>HE have said they will submit further written representations but have the proposed discussions with HE taken place concerning these Monuments?</p>	<p>We note the applicant’s response to 11.0.3.</p> <p>We can confirm that the applicant has consulted Historic England during the options selection stage, specifically regarding the alignment of the proposed scheme between junctions 22 and 23. We can also confirm that we are satisfied that no direct physical impact is predicted to either Asset 399 (Neolithic Mortuary at Appleford Farm, Rivenhall) or Asset 818 (medieval moat at Marks Tey Hall).</p> <p>We have provided detailed comments relating to this Scheduled Monument in Section 5.3 of our Written Representation. We consider the</p>





		<p>setting of the Scheduled Monument contributes positively to its significance. We consider the proposed development would result in a significant change to the setting. We consider this would result in harm to the significance of the Scheduled Monument.</p> <p>We recommend our comments Scheduled Rivenhall Long Mortuary Enclosure are addressed by the applicant, and the magnitude of impact and the significance of effect reassessed. We would be pleased to provide further advice and guidance.</p> <p>We note the applicant has stated the value of the value of Medieval moat at Marks Tey Hall is principally evidential, derived from its well-preserved archaeological remains and its setting, as part of the group of assets making up the post-medieval manor farm, which contributes to its historic value. We note that applicant states this would not significantly affect the understanding of the asset or its heritage value. We note the applicant is content that the mitigation measures proposed are adequate.</p> <p>In terms of the scheduled Medieval moat at Marks Tey Hall, we have provided detailed comments relating to this Scheduled Monument in Section 5.4 of our Written Representation. We consider the proposed development would result in a significant change to the setting. We consider this would result in harm to the significance of the Scheduled Monument.</p> <p>We recommend our comments relating to the scheduled Medieval moat at Marks Tey Hall are addressed by the applicant, and the magnitude of</p>
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		impact and the significance of effect reassessed. We would be pleased to provide further advice and guidance.
11.0.4	The Cultural Heritage report [APP-074] identifies 45 significant effects during construction and 6 significant effects during operation. None of these impacts are assessed as meeting the test equating to substantial harm. Is the Applicant still satisfied with this assessment?	We note the applicant's response to 11.0.4.  We are satisfied with the assessment and satisfied that none of the impacts meet the test equating to substantial harm.
11.0.5	The Archaeological Strategy [APP-118] makes a number of suggestions concerning possible public engagement in the future reporting on the outcome of any historical discoveries during the progress with the project. Is the Applicant prepared to make a firm commitment to this?	We note the applicant's response to 11.0.5.  We have provided detailed comments relating to the Archaeological Strategy and possible public engagement in Chapter 11, and in particular Sections 11.21-11.29, of our Written Representation.  We recommend these comments are addressed by the applicant and we would be pleased to provide further advice and guidance.

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,

Jess Tipper

Dr Jess Tipper

Inspector of Ancient Monuments

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