



Historic England

**RESPONSES TO THE WRITTEN QUESTIONS OF THE EXAMINING
AUTHORITY FOR DEADLINE 2 (3rd May 2019)**

ON BEHALF OF THE

**HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR
ENGLAND**

(HISTORIC ENGLAND)

(“HBMCE”)

Application by

**Highways England for an Order granting Development Consent for
the A303 Amesbury to Berwick Down**

PINS Reference No: TR010025

HBMCE Reference No: 20019871

Deadline 2 Submission

03 May 2019

HBMCE Responses to ExA Questions for Deadline 2 (3rd May 2019)

| <u>ExA Question Ref & Topic:</u> | <u>Question for:</u> | <u>Question</u> | <u>HBMCE Response</u> |
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| AL.1 | | Alternatives | |
| Alternatives | Historic England the National Trust and the Stonehenge Alliance | Please develop your RRs regarding alternatives including reference to the NPSNN, paragraphs 4.26 to 4.27, identifying any legal requirements and policy requirements set out in the NPSNN relating to the assessment of alternatives with which it is considered that the Applicant has failed to comply. | <p>HBMCE (Historic England) was presented with appraisals by Highways England (HE) of the various iterative options for (at high scale) the route of the Scheme, and illustrative examples of how a scheme might appear, in 2017 and 2018. Our advice on those options were set out in our letters of March 2017, November 2017, April 2018 and August 2018 which are appended to our Written Representations and summarised (in relation to those points and concerns which remain important and relevant to the current iteration of the Scheme) at Section 4.10 therein.</p> <p>The World Heritage Committee considered the issue of alternative routes at its session in 2018. The draft decision (included at Appendix 19 to HBMCE’s Written Representations) prepared by the Secretariat urged “the State Party to continue to explore further options and design refinement, with a view to avoiding impact on the OUV of the property, including ... alternative surface bypass options”. Following discussion in the session the Committee decided to amend the draft decision and, amongst other changes, deleted the section about</p> |

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| | | | <p>continuing to explore alternative by pass options (HBMCE Written Representations Appendix 20) In making this deletion it is clear that the Committee was content that, in its view, further exploration of alternatives was not necessary. In addition Appendix 11 to our Written Representations sets out the consideration and conclusions of the World Heritage Committee with respect to alternatives in particular at APP 11.38.</p> <p><u>The Convention Concerning the Protection of the World Cultural and Natural Heritage 1972</u></p> <p>In summary, the Convention Concerning the Protection of the World Cultural and Natural Heritage 1972 (the 1972 Convention), requires under Article 4, the State Party (here, the UK) to do all it can to ensure the protection and conservation of the Stonehenge, Avebury and Associated Sites World Heritage Site (SAAS WHS) identified in the two area shown coloured yellow in Figure HA1. Article 5(d) requires the State Party to do all it can to take appropriate legal, scientific, technical, administrative and financial measures necessary for the protection and conservation of the SAAS WHS property.</p> <p>The Stonehenge, Avebury and Associated Sites World Heritage Site Management Plan 2015 derives from paragraphs 108-109 of the Operational Guidelines for the Implementation of the World Heritage Convention (2013) and Articles 5(a) and (d) and 6(2) of the 1972 Convention. Paragraphs 11.1.16-120 of that Plan (and the Map on page 160) records the absence of alternatives to a bored tunnel and the need to find a</p> |
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| | | | <p>solution to the negative impacts of the A303.</p> <p>The Guidance on Heritage Impact Assessments for Cultural World Heritage properties (January 2011) provides, under paragraph 4-4 for the emergence of alternatives in such an assessment. The Application HIA addresses alternatives in Section 7.3, paragraphs 7.3.1-7.3.24.</p> <p><u>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017</u></p> <p><u>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2015 Regulations) apply to applications for development consent under the Planning Act 2008. Regulation 4 prohibits a grant of development consent without considering environmental information. By Regulation 3(1), and Schedule 4, paragraph 2, the EIA must include a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.</u></p> <p>The EIA Report, Chapter 3: Assessment of Alternatives addresses, in Sections 3.1-3.2, the consideration of alternative to the scheme described in the first draft of the development consent order (d1DCO).</p> |
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| | | | <p><u>Planning Act 2008</u></p> <p>Section 104(4) of the Planning Act 2008 requires that the Application be determined in accordance with the provisions of any relevant National Policy Statement (NPS). Here, the National Networks NPS (NPSNN) is relevant.</p> <p>The NPSNN requires, at paragraphs 4.26-4.27, consideration of alternatives for the purposes of EIA. The EIA has addressed alternatives to the d1DCO. See above under Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.</p> <p>The appraisal undertaken by Highways England (HE) has undertaken an “options appraisal” in relation to the alternatives for the route of a highway in place of the A303 as it passes through the SAAS WHS property. See Section 3 of the EIA Report, Chapter 3: Assessment of Alternatives, paragraphs 3.3.2 and Table 3.1.</p> |
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| Cultural heritage (ES Chapter 6: Cultural heritage) | | |
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| CH. 1.29 | Historic England National Trust | <p>ES Appendix 2.2 OEMP</p> <p>Historic England have concerns that Table 3.2a (Specific Measures to apply to preliminary works) contains insufficient detail given the very high sensitivity of the proposal.</p> <p>Please provide details of additional specific measures which should be embedded in the OEMP and whether these could be contained in the DAMS.</p> |
| <p>HBMCE (Historic England) has provided our initial comments on the approach to the OEMP and the measures required to be embedded within it in our Written Representations at 7.6.127-135 therein. In general, there remains a body of information required from Highways England (as set out in detail throughout our Written Representations) to inform approaches to the environmental management of the Scheme. In the absence of this detail at this stage, and of parameters to ensure its provision and consideration of it at this time, we are not as yet able to provide details of all of the specific measures that are likely to be required in the OEMP. We will, however, consider this further and respond in due course to assist the Examining Authority further. HBMCE has also been provided with the DAMS only recently and is currently considering the latest version of the document which is due to be submitted at Deadline 2.</p> <p>In summary our concerns and recommendations for inclusion at this time are as follows:</p> <p>Approvals: The result of the requirement for development consent under the Planning Act 2008 would be to avoid the need for consents under certain statutory heritage regimes. See section 33(1) of that Act. Since one</p> | | |

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| | | | <p>requirement of the CEMPs is the control of potential impacts upon the historic environment, HBMCE considers that there is need for approval of all management plans, detailed schemes (including WSIs) and method statements implemented in relation to the OEMP, and any CEMP/HEMP or other management plan included within the OEMP by the relevant heritage statutory consultee. (See HBMCE Written Representations 7.6.128-130).</p> <p>Communication: Terms of a clear strategy is required setting out how and who within the Project Team is responsible for liaising with the relevant heritage statutory consultees who should ultimately be responsible as the archaeological curators for the Scheme in monitoring and overseeing compliance with heritage legislation, the consent and DCO documentation in so far as it pertains to the historic environment. (See HBMCE Written Representations 7.6.129).</p> <p>Avoidance of collateral damage: The establishment of a procedure for managing and securing under the DCO the avoidance of collateral damage to and preservation in situ of standing and below ground remains is required. This must include all temporary works and must clarify the measures that will be implemented to ensure the full range of impacts, including compression of below ground remains, will be avoided (See HBMCE Written Representations 7.6.132).</p> |
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| | | | <p>Wider impacts: Given the sensitivity of the inscribed landscape of the SAAS WHS HBMCE would wish to consider further the potential need for our particular involvement (along with WCAS) in relation to all works and proposals included in management plans under the OEMP where these will intersect with and have potential to impact upon the historic environment (beyond those included in Tables 3.2a and b, g). Consequently we would advise that provision is made in the OEMP for a process of consultation in relation to the historic environment and, where necessary, formal approval by an appropriate body on any details which it is agreed can be determined following the granting of consent, regardless of whether they are categorised by HE (as a highway authority concerned with highways infrastructure) to relate to cultural heritage or not. (See HBMCE Written Representations 7.6.131).</p> <p>Land Contamination: Management plans should include provisions for dealing with potential for preventing contamination either in relation to temporary works, compounds and infrastructure or dealing with existing such as in relation to agricultural land within the Scheme (See HBMCE Written Representations 7.6.133).</p> <p>Non-tangible effects: The relevant management plans for the d1DCO Scheme should directly engage with how,</p> |
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| | | | <p>in addition to preservation of in situ remains, they will establish a procedure for managing the effect of the Scheme (including during construction) on the less tangible Attributes of OUV of the WHS with direct reference to the policies of the WHS Management Plan and securing the execution of the works in such a way as to limit the likely significant temporary effects of the Scheme. (See HBMCE Written Representations 7.6.134).</p> <p>Diversiónary routes: The relevant management plans should set out how any impacts assessed under the EIA in relation to the historic environment from the use of diversionary routes will be managed and minimised (HBMCE Written Representations 7.6.135).</p> <p>DAMS: In relation to the DAMS, and incorporation of the terms of appropriate measures in that document, HBMCE have been made (see HBMCE Written Representations). Adherence to the DAMS document terms should be ensured through appropriate terms in the d1DCO.</p> |
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| ES Appendix 6.1: Heritage Impact Assessment | | |
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| CH.1.30 | Applicant HMAG | <p>Paras 3.6.7-12: HMAG and the Scientific Committee</p> <p>HBMCE responses to this Question are provided in its role as a member of HMAG and not on behalf of HMAG.</p> <p>HMAG is an advisory body which has given comments to Highways England without prejudice to the responsibilities of its four individual member bodies (including HBMCE), including those bodies which have statutory responsibilities (See HBMCE Written Representations 2.21).</p> <p>Therefore, whilst HBMCE (Historic England) is a member of HMAG, HMAG does not itself represent HBMCE nor vice versa and neither can bind the other.</p> <p>HBMCE has statutory responsibilities and powers and its primary role in relation to the d1DCO Scheme is as a statutory consultee and as DCMS’s adviser in relation to the WHS status.</p> <p>By contrast, there is no requirement for HMAG to form a consensus, and indeed due to the separate responsibilities and remits of the separate organisations this may not be possible in all cases.</p> <p>HBMCE are aware that all four of HMAG’s individual members are making separate representations on the</p> |

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| | | | <p>Scheme. Our response below therefore represents the advice HBMCE has provided as a member of that forum but does not necessarily represent the shared view of its other members.</p> |
| | | <p>i. Have HMAG's recommendations been incorporated in the Scheme?</p> | <p>HBMCE (Historic England) is not aware that HMAG has itself published any recommendations.</p> <p>HBMCE is aware that the iterative advice provided by HBMCE remains in the process of being incorporated into various aspects the d1DCO Scheme. For example, our advice regarding the development of the DAMS (due to be submitted at Deadline 2) is in the process of informing that document.</p> <p>In parallel, as part of HBMCE's role as a member of HMAG, HBMCE continues to work collaboratively with the other members of HMAG in providing our statutory advice as part of that forum and to provide our recommendations to Highways England as the Scheme develops through the Examination. We would expect HBMCE's iterative approach to the agreement of SoCGs during the Examination period to demonstrate to the Examining Authority the way in which our advice is incorporated as the Examination progresses, and to highlight any areas where we do not consider that it has been adequately addressed should this occur.</p> |

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| | | <p>ii. Do HMAG have misgivings over any aspects of the Scheme?</p> | <p>HBMCE (Historic England) refers to the previous Response.</p> <p>HBMCE responds as a member of HMAG; the views HBMCE expresses are not those of HMAG but may align with them.</p> <p>HBMCE supports the aspirations of the Scheme and considers that it offers a once in a generation opportunity to address the harm currently being caused to the Attributes, Integrity and Authenticity of the internationally important SAAS WHS by the presence of the existing A303.</p> <p>However, as set out in the Relevant Representations of HBMCE and expanded on in further detail throughout our Written Representations, if this potential is to be realised in practice, it is essential that a number of matters are addressed, and satisfactorily so, such as by inclusion of Protective Provisions and Requirements to ensure delivery of the stated Scheme aspirations and objectives.</p> |
| | | <p>iii. Would HMAG and WCAS be able to contribute to the examination as groups, perhaps at hearings or preparing statements of common ground with the Applicant?</p> | <p>HBMCE (Historic England) will be in attendance at the relevant hearings to provide its views alongside those of the other members of HMAG.</p> <p>Since there is no requirement for HMAG to form a consensus, and given the different responsibilities and remits of the separate organisations, this may in some cases not be possible, we would not look to prepare a SoCG jointly with the Applicant.</p> |

| ES Additional Submission 2: Document clarifying the relationship between the archaeological mitigation strategy documents | | | |
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| <p>CH.1.49</p> | <p>Applicant Any other parties</p> | <p>Para 1.2.3 (See also paras 1.2.5, 1.3.1, and 1.5.1)</p> <p>This para tells us that the DAMS will be developed in consultation with the HMAG, comprising Historic England, WCAS, the National Trust, and English Heritage. Elsewhere in the ES (See OAMS para 1.2.7, etc.), it is noted that the development and operation of the DAMS and subsequent documents will be carried out in agreement with these parties.</p> <p>The matter of agreement is a significant concern, which should be secured in the DCO</p> | <p>HBMCE (Historic England) agrees with the ExA that the terms of the d1DCO should provide for the inclusion of, and requirement to adhere to, the DAMS. Given the length of the DAMS, it would be appropriate to include it as a Protective Provision in a Schedule to the d1DCO together with appropriately framed heritage objectives reflecting the terms of the Secretary of State for Transport, Objective 3. See The Introduction to the Application, paragraph 2.1.2, bullet 3; and also The Case for the Scheme, Table 0-1, Client Requirements, Row 3.</p> <p>HBMCE will continue to provide our advice to Highways England on the development of the DAMS. The matter of agreement of the final document and subsequent SSWISs is similarly a significant concern to HBMCE. We would welcome additional clarification from Highways England in relation to this question and similarly ExA CH. 1.36 setting out the proposed process of agreement and how they would look to secure it in the DCO.</p> <p>Given HBMCE’s role as a statutory body and in relation to the protection of scheduled monuments on behalf of Government (see HBMCE Written Representations 2.3) we consider that the proposed process of agreement should reflect that role and refer to HBMCE separately in relation to approval (in addition to WCAS) following consultation with HMAG (as opposed to meshing HBMCE with HMAG).</p> |

| ES Appendix 6.11: Outline Archaeological Mitigation Strategy | | | |
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| CH. 1.51 | Applicant | <p>Para 1.2.2: Signing off of sites to construction</p> <p>Please confirm this is to happen only with the agreement of HMAGS/WCAS.</p> | <p>This Question is addressed to the Applicant. However, HBMCE advises as follows.</p> <p>The proposed d1DCO Scheme would traverse SAAS WHS property.</p> <p>The d1DCO Scheme also sits on land on which a number of scheduled monuments are situated.</p> <p>HBMCE's role during the preliminary works and construction stages of the Scheme will include the need to ensure that the scheduled monuments are adequately protected and outside any impacts of construction. Given HBMCE's role as a statutory body and in relation to the protection of scheduled monuments on behalf of Government (see HBMCE Written Representations 2.3) we consider that the proposed process of signing off of sites to construction should reflect that and refer to HBMCE separately in relation to approval (in addition to WCAS) following consultation with HMAG.</p> |
| CH.1.54 | HMAG | <p>Mitigation measures</p> <p>Please comment on the detailed mitigation measures proposed in the OAMS.</p> | <p>This Question is addressed to the HMAG. However, HBMCE (in its role as a member of HMAG) advises as follows.</p> <p>The DAMS has developed from the OAMS, a brief document submitted as part of the original DCO application which gives a high level overview of the types of recording method likely to be employed (Table 2.1), an initial proposal for areas to be preserved in situ (Table 2.2) and areas for detailed archaeological fieldwork (Table 2.3), and an outline of the method statements that would be included in the OWSI.</p> |

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| | | | <p>Given the limited complexity and content of the OAMS HBMCE has restricted its comments in our Written Representations (see 7.8.117-7.8.126) to the emerging DAMS (due to be submitted at Deadline 2).</p> <p>Once the DAMS has been submitted HBMCE will be able to provide further detailed comments on the mitigation measures proposed to assist the Examining Authority.</p> |
| DCO.1 | Draft Development Consent Order (dDCO) | | |
| DCO.1.30 | <p>Wiltshire Council</p> <p>Natural England</p> | <p>Article 7 – Limits of Deviation</p> <p>Please comment on the limits of deviation proposed for the development.</p> | <p>This Question is addressed to Wiltshire Council and to Natural England. However, HBMCE (in its role as advisor to the States Party UK in respect of the 1972 Convention) advises as follows.</p> <p>The d1DCO would authorise the development of all parts of the area outlined in red (as Order land). The red outlined area traverses the property comprising the SAAS WHS.</p> <p>The Applicant has assessed a potential illustrative scheme in its EIA but this is not reflected in the current terms of the d1DCO in the absence of Protective Provisions, Design Principles, and Requirements.</p> <p>HBMCE remains concerned at the degree of flexibility being sought by HE for the development of infrastructure within an inscribed landscape of the SAAS WHS. However, we anticipate that during the examination period, appropriate terms can be drafted in the d1DCO to appropriately mesh the scheme described by the d1DCO with the scheme that has been assessed by the</p> |

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| | | | <p>Application assessment documents.</p> <p>We would want to see the limits of deviation utilised to secure additional positive benefit rather than reduction in benefit or increase in negative effects.</p> |
| DCO.1.95 | Applicant | <p>Requirement 4 – Outline Environmental Management Plan</p> <p>The OEMP, Table 3.2b (D-LAN2), provides a commitment that the provision of fencing and surfacing within the WHS shall be developed in consultation with the National Trust, Historic England, English Heritage, and Wiltshire Council and approved by The Authority.</p> <p>Should this be the subject of a specific Requirement in the dDCO?</p> | <p>This Question is addressed to the Applicant. However, HBMCE advises as follows.</p> <p>HBMCE considers that it may be possible to agree details of surfacing materials and fencing at a later stage in some areas, provided there is provision in the DCO for a process of approval including from heritage statutory consultees in line with an agreed and approved set of design and construction principles.</p> <p>We consider the approach to surfacing of the decommissioned A303 particularly sensitive and a high level of commitment to detail and design parameters would be required at an early stage for approval including from heritage statutory consultees.</p> |
| DCO.1.97 | Wiltshire Council | <p>Requirement 5 - Archaeology</p> <p>ii. Please suggest how any additional mitigation required to minimise the adverse impacts of the scheme on the setting of asset groups in the western part of the WHS might be secured by the dDCO.</p> | <p>This Question is addressed to Wiltshire Council. However, HBMCE (in its role as advisor to the States Party UK in respect of the 1972 Convention) advises as follows.</p> <p>HBMCE has outlined in our Written Representations (Section 7) a series of additional information which it considers is necessary to fully assess the outline Scheme. On provision of this information from Highways England we will be further able to advise the Examining</p> |

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| | | | Authority on how effective the current mitigation proposals are likely to be, and make recommendation regarding the provisions that would be necessary to secure the level of mitigation they provide. |
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| Fg.1.26 | <p>Applicant</p> <p>Historic England</p> <p>Environment Agency</p> <p>Wiltshire Council</p> <p>Mark Bush (on behalf of Blick Mead Archaeologist Team)</p> | <p>Blick Mead – hydrology</p> <p>i. Please provide an update on the hydrological monitoring at Blick Mead and what additional investigation and monitoring has been undertaken to date.</p> <p>ii. Please provide an update on the discussion about how this data is to be used and the implications for the tiered assessment.</p> | <p>HBMCE (Historic England) advises as follows.</p> <p>Blick Mead is not a scheduled monument and consequently HBMCE (Historic England’s) involvement to date has been in relation to providing Highways England with clarification on how to undertake a Tiered Assessment in line with our Preserving Archaeological Remains guidance (2016) to inform an assessment of the potential impact of the Scheme on the significance of the site.</p> <p>We have set out our advice to date in our Written Representations (see 7.6.80-96).</p> <p>HBMCE would expect to make further representations in relation to the assessment of the site following review of the Representations of the Environment Agency (on the core documentation regarding the Ground Water Assessment against which the trends seen in the data collected from Blick Mead have been compared), and from the Blick Mead Archaeology Team.</p> <p>We are however, at this time, able to confirm that the Tiered Assessment has been completed in accordance with the methodology set out in our Preserving</p> |

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| | | | Archaeological Remains guidelines (2016). |
| Fg.1.27 | <p>Applicant</p> <p>Historic England</p> <p>Environment Agency</p> <p>Wiltshire Council</p> <p>Mark Bush (on behalf of Blick Mead Archaeologist Team)</p> | <p>Blick Mead – hydrology</p> <p>i. Please provide an update on the provision of water meters at Blick Mead and the related data.</p> <p>ii. What timescales are necessary to secure an appropriate baseline and, if this has not been completed, what are the implications and how could any mitigation be secured through the DCO?</p> | <p>HBMCE (Historic England) would refer the Examining Authority to our response above to question Fg. 1.26 and our more detailed comments in our Written Representations (see 7.6.80-96).</p> |
| Fg.1.28 | <p>Applicant</p> <p>Historic England</p> <p>Environment Agency</p> <p>Wiltshire Council</p> <p>Mark Bush</p> | <p>Blick Mead – hydrology</p> <p>i. What consideration has been given to hydrological monitoring (and any associated remediation, if required) at Blick Mead during the construction and operational phases of the proposed development.</p> <p>ii. How would this be secured through the DCO?</p> | <p>HBMCE (Historic England) would refer the Examining Authority to our response above to question Fg. 1.26 and our more detailed comments in our Written Representations (see 7.6.80-96).</p> |

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| | (on behalf of Blick Mead Archaeologist Team) | | |
| Ns.1 | Noise and vibration | | |
| 1.15 | Applicant, Wiltshire Council, Historic England | <p>Vibration The application documentation indicates tunnel boring machine vibrations could impact on a long barrow. It is suggested that the situation would be monitored but no remedy is offered for damaging impacts.</p> <p>i. Is there potential for damage to archaeological known or unknown remains, such as fragile inhumations, on or close to the tunnel?</p> | <p>HBMCE (Historic England) advises as follows.</p> <p>HBMCE is aware that the HIA identifies that the tunnel passes directly <i>beneath</i> the long barrow 250m north of Normanton Gorse (NHLE no. 1008953) (HIA 9.2.8) and that significant impacts as a result are not anticipated.</p> <p>However, HBMCE is unable at the current time to form a concluded view on this assessment as additional information on how it was conducted in relation to the long barrow remains required and relevant parameters within which to provide for an assessment remain absent also.</p> <p>i) HBMCE is unable at the current time to form a view on this potential since we have not been able to identify sufficient detail on the tunnel movement monitoring stations location, and process of installation to assess any archaeological implications these might have and have requested that this is addressed as part of the iterative development of the DAMS. However given the density of archaeological remains preserved in this landscape we would expect this to be a possibility.</p> |

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| | | | <p>HBMCE advises that HE submit additional information in relation to the assessment they have carried out specifically in relation to the potentially affected long barrow. We would then be able to provide further detail to our own representations on this issue to assist the Examining Authority about what measures we would expect to see secured in the OEMP and related documentation and in the DCO to ensure that archaeological remains are dealt with appropriately (See HBMCE Written Representations 7.6.56).</p> |
| | | <p>ii. How has the impact of vibration been taken into consideration relative to the sensitivity of the historic environment?</p> | <p>HBMCE would refer the Examining Authority to the response of the Applicant at this time.</p> |
| | | <p>iii. The tunnel workings indicate a degree of settlement what implications would this have for the surrounding archaeology and the historic environment?</p> | <p>HBMCE (Historic England) advises as follows.</p> <p>It is unclear whether there can be an engineering solution to this potential and HBMCE considers that this a matter for HE to provide further information upon.</p> <p>HBMCE considers that if buried and/or above-ground archaeological remains are subject to settlement, this could distort the below-ground stratigraphy and/or the profiles of earthworks, as well as leading to topographic and landscape changes (even if on a small scale). This would be highly undesirable and we would therefore</p> |

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| | | | welcome submission of additional information from Highways England in relation to how they propose to minimise this potential and mitigate against it. We would then be able to provide further detail to our own representations on this issue to assist the Examining Authority regarding what measures we might expect to see secured in the OEMP and related documentation and in the DCO to ensure that, if this was possible in practice, any impacts were avoided. |
| | | iv. What mitigation is proposed, how would this be monitored? | HBMCE would refer the Examining Authority to the response of the Applicant at this time. |
| | | v. What degree of tolerance would be regarded as appropriate to minimise or avoid any adverse effects? | HBMCE is unable to provide a view on the degree of tolerance that would be considered appropriate in the absence of additional clarification from Highways England in relation to their assessment of this issue in relation to archaeological remains above and below ground. In general we would expect to see measures secured to avoid any works resulting in the changing of shape of above-ground archaeological sites and earthworks, nor below-ground remains to be distorted, particularly if any of these are nationally important (and express attributes of OUV). |
| SE.1 | Socio-economic Effects | | |
| SE.1.8 | Applicant | Socio-economic effects What consideration has there been in respect of | The WHS status has informed the progress of collaborative discussion resulting in the formation of HMAG and the Scientific Committee and inviting ICOMOS to comment via |

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| | <p>National Trust English Heritage Historic England</p> | <p>the status of the site as a WHS, the economic value this brings to the area, and the degree of risks the works as currently proposed have to the future status of the site as a WHS?</p> | <p>advisory missions taking on board their recommendations.</p> <p>HBMCE in an Appendix to our Written Representations has set out for the Examining Authority’s benefit (Appendix 11) the consideration and conclusions of the World Heritage Committee in relation to the iterative versions of the Scheme to date and the concerns they have expressed in this regard.</p> <p>In providing our advice on the Scheme at all stages the status of the WHS has been at the forefront of our consideration. Our position remains that the Scheme offers potential to deliver a beneficial outcome for the historic environment and to sustain and enhance the OUV of the WHS and during the process of Examination we will be seeking the additional information to clarify how that benefit will be achieved and the mechanisms by which it will need to be secured.</p> |
| SE.1.37 | <p>Applicant National Trust Historic England</p> | <p>Socio-economic effects</p> <p>If the scheme is completed, it is argued that the WHS will become more attractive, reuniting the historic landscape currently divided by the A303.</p> <p>i. Have any plans been prepared to</p> | <p>HBMCE’s involvement would be in relation to the management of the SAAS WHS and monitoring the implementation of the 2015 WHS Management Plan especially Policies 4c, 6a, and 6b which are relevant here. We would ensure that continued positive management flowed from the policies of the Management Plan for regular review is considered good practice.</p> |

HBMCE Responses to ExA Questions for Deadline 2 (3rd May 2019)

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| | | <p>cater for this? ii. How would this be managed to continue to safeguard the future of the WHS?</p> | |
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