

HISTORIC ENGLAND RESPONSE TO PHASE 2a EIA SCOPE AND METHODOLOGY (SMR) DRAFT REPORT

Thank you for consulting us on the Phase 2a EIA Scope and Methodology Report – Draft for Consultation. We have previously provided comments on a review of the Phase 1 SMR.

Chapter 10. Cultural Heritage

Historic Landscape Character

In our response to the Environmental Statement (ES) for Phase 1, we stated our view that the assessment of the impact upon the historic landscape character, particularly in the Chilterns AONB, was very limited. We therefore welcome the recognition of our concerns expressed at 10.3.6 and can confirm that early discussions have already taken place with respect to a methodology for the assessment. We note that the methodology will not appear in the SMR itself, however, and we recommend that it should do so, even if only in an indicative and abbreviated form. This would indicate that it carries equal weight with the assessment of Landscape and Visual effects described in S15, and would allow the relationship between the two to be clearly expressed (see 10.5.13).

Noise Effects

While we accept that the impact of noise on historic assets was considered within the Phase 1 ES, we have previously recommended that a more rigorous methodology might be produced for assessing the impact within phase 2a. We understood that this was being produced and are disappointed that the only reference in the draft SMR is to our own guidance on setting (10.3.7). Such a methodology does not need to be complex or detailed, but should allow assessments within the ES to be logical and consistent and based on established rules.

Viability

We have repeatedly raised the issue of the assessment of viability of heritage assets with respect to phase 1, and we welcome the addition of a bullet point (BP9) under 10.4.1 which refers to this as a Key Aspect of the Proposed Scheme. We understood that a programme of work was being carried out to assess which assets might be affected on phase 1. We recommend that a clear methodology be produced for such an assessment in phase 2a, which should then lead to a list of any such affected assets within the ES, together with proposals for the mitigation of the effect.

Setting

We note that temporary setting effects arising from construction are referred to in BP4 under 10.4.1, but it is not clear that BP10 refers in turn to permanent setting effects arising from construction and operation, or even if it is intended to. A statement is needed that permanent setting effects will be assessed. Possibly a simple additional bullet point below BP4 reading 'permanent setting effects on designated and other heritage assets arising from construction or operation' would make it clear.

Risk modelling

We welcome the proposal to issue a revised technical note, but we suggest adding the following at the end of 10.2.6. 'Any such assessment of risk/potential will need to be informed by the character and potential of a wider area of landscape than that defined in the study area.' Such a landscape based approach might be usefully informed at the outset by a landscape narrative which seeks to establish the current level of knowledge about the landscape development along the route of phase 2a.

Study area

There appears to be some confusion over the definition of the study area. At 10.2.7 it is given as the LLAU plus 500m for all *non-designated* assets, and at 10.2.8 it is given as LLAU plus 2km for *designated* assets. But at 10.5.7 it is stated that the study area for impact upon *all* assets will be LLAU plus 500m.

10.2.3, second BP, item d. Omitted word after 'archaeological'?

The equivalent section to 10.5.3 in the phase 1 SMR (8.5.3) included a reference to the possibility that indirect effects could include the loss of access to archaeological remains for future investigation beneath engineering works, even though they may remain preserved. We feel this should be reinstated.

Assessment Methodology

In table 18 assets are assigned a particular 'significance (value)', which is in most cases a function of their level of designation. The addition of the bracketed word 'value' is useful in defining this as being different from the significance of the asset concerned, but it does need to be used consistently, e.g. table 20 refers to 'significance and value', and last sentence of 10.6.10 refers to 'a level of significance' where it should refer to a level of 'significance (value)'.

We do very much welcome the flexibility offered by the three paragraphs in each of the asset categories that refer to non-designated heritage assets, buildings, etc. They do however leave the question of how any individual asset is going to be assigned to each of these categories. We suggest a more consistent wording as follows, with high/moderate/low inserted as appropriate:

‘Non-designated heritage assets (archaeological sites, buildings, monuments, or landscapes) that can be shown to have high/moderate/low significance (value).’

We suggest that Conservation Areas should remain in one asset category only, otherwise the EIA will be required effectively to grade Conservation Areas.

In the ‘low’ and ‘not significant’ categories, there does not seem to be any difference between ‘assets that are so badly damaged that too little remains to justify inclusion into a higher grade’ and ‘assets whose values are compromised..’etc. These might benefit from a rewording that makes the difference clearer.

Chapter 15 Landscape and Visual Assessment.

It is important that the linkages between Landscape and Visual Assessment, Historic Landscape Characterisation and the historic environment generally are kept in view (GLVIA (3rd Ed)5.7-5.11) and we welcome the references to this in this section.

15.2.1 As this is intended to run from south to north the reference to Cheshire in the first bullet point is puzzling.

15.3.2 Reference should presumably be to Historic England rather than English Heritage.

If you require an alternative accessible version of this document (for instance in audio, Braille or large print) please contact our Customer Services Department:

Telephone: 0370 333 0607

Fax: 01793 414926

Textphone: 0800 015 0516

E-mail: customers@HistoricEngland.org.uk