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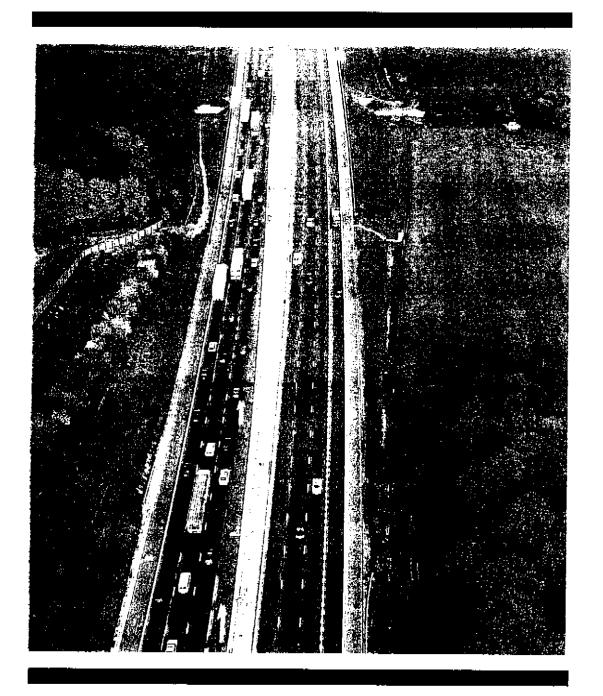
ENVIRONMENT & LANDSCAPE Environmental Statement

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M25 M25 JCT.6 EASTBOUND APPROACH SAFTEY SCHEME VOL.2 PART 7: CULTURAL HERITAGE (DRAFT) 06/98



M25 Junction 6 Eastbound Approach Safety Scheme



Environmental Statement

DRAFT

Volume II
7. Cultural Heritage



HIGHWAYS AGENCY

M25 JUNCTION 6 EASTBOUND APPROACH SAFETY SCHEME

ENVIRONMENTAL STATEMENT

VOLUME I!

7. CULTURAL HERITAGE

Prepared by

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S.0 EXECUTIVE SUMMARY: CULTURAL HERITAGE

- S.1 The proposed safety improvements to the M25, approaching Junction 6 have been studied in order to assess the potential effects on cultural heritage.
- S.2 The County Councils' Sites and Monuments Records (SMRs) were consulted to update the areas of known archaeological interest, and to assess the potential of areas where there was little or no information.
- S.3 Areas where further archaeological study is recommended have been identified. It is recommended that this takes the form of monitoring during the construction works.
- S.4 Monitoring of trial pits on the M25 on either side of Junction 6 has shown that the majority of areas where an intact original ground surface might have been expected have in fact been disturbed by the construction of the existing motorway.

1.0 INTRODUCTION

1.1 Introduction

1.1.2 This report has been prepared by RPS Clouston for Parkman Consulting Engineers on behalf of the Highways Agency (HA). The report details an archaeological study of land potentially affected by the modification of the lanes on the eastbound carriageway of the M25 approaching Junction 6. It addresses the existing conditions, the effects of the scheme, and mitigation measures appropriate to the level of risk. The findings form part of the Environmental StatementThe Environmental Statement has been placed on deposit at the locations listed in Part 1 of the Statement, Appendix D. The Statement is divided into two parts:

Volume I - The Statement and Non-Technical Summary

Volume II - Specialist Reports

Landscape and Visual Impact

2. Ecology and Nature Conservation

Water **Quality**

4. Noise

Air Quality

6. Soils

7. Cultural Heritage.

1.2 The Proposal

1.2.1 The eastbound carriageway of the motorway will be improved from three to four lanes approaching Junction 6 within the existing highway boundaries by the conversion of the existing hard shoulder into a traffic lane and the construction of a new hardshoulder alongside. Existing embankments and cuttings will be steepened and retaining walls will be constructed where necessary. The length involved is about 1200m. The length includes cuttings, embankment and at grade sections.

1.2.2 Cuttings have already destroyed any archaeological features through which they pass, so areas where steepened cuttings are proposed will have no further impact on archaeology. Steepening the slope of existing embankments would entail the construction of retaining walls which could penetrate to potential archaeological deposits sealed beneath the embankments. Areas at grade may also be archaeologically affected by new land disturbance within the fence line.

1.3 Methodology

1.3.1 The scope and methodology of the study is based on the Design Manual for Roads and Bridges,
Vol 11 (DMRB), (DoT 1993). Three stages of archaeological survey are described in the
DMRB, each corresponding to the progress of the road proposals. They are as follows:

<u>Stage 1</u> which is the collection of the available information over a wide study area at the Initial Study phase;

<u>Stage 2</u> which is the checking of the Stage 1 data, a desk-top study, walkover survey where appropriate, and a review of potential impacts related to alternative options, including a view from English Heritage on the study; and

<u>Stage 3</u> which is the collection of any further data (through the use of field evaluation techniques if necessary) which might be required to establish the impact of the preferred route option and to enable mitigation measures to be proposed. This report is the result of Stage 2 studies.

The results of a Stage 1 study of the south eastern sector of the M25 (Junctions 2-8) carried out by RPS Clouston to the guidelines set out in the now superseded DoT Manual of Environmental Assessment are contained in the Landscape Report (May 1991).

- 1.3.2 Previous archaeological studies have been undertaken in connection with the widening proposals between Junction 5 and 7. These are summarised in a Stage 2 desk-top survey (Environmental statement Volume II, 7: Cultural Heritage, 1994). This included a test-pit observation study of the route on either side of Junction 6.
- 1.3.3 In December 1993 in connection with the proposals for work between Junctions 5 and 7, RPS Clouston carried out a review of the SMR data and a targeted walkover survey to appraise the state of the fields and note any visible earthworks or soil marks. Sections of the North Downs Way (known in places as the Pilgrims' Way) were also walked. The results of this survey are summarised in the 1994 Environmental Statement (Appendix 3). Trial Pit inspections were carried out to the west and east of Junction 6, but not in the area of the current proposal. For the present proposal the SMR data has been updated. The relevant new information relates to the Godstone Hill Quarry (firestone), which was worked by the pillar and stall method in the 19th and

early 20th century. Several entrances (now filled in) existed north and south of the motorway Junction 6 (SMR 3988, 3989). Roman pottery found in the area of the junction itself noted as SMR 1989 has been augmented by a further reference SMR 4254, and a Roman coin has been reported by a metal detector user west of North Park Farm (SMR 4120).

1.3.4 In view of the construction methods outlined in para 1.2 only areas at grade and embankments have been considered to be potentially at risk of archaeological impact. The review of the initial study data has been used to target areas at risk where there may be archaeological potential. This report identifies these areas and proposes further work.

2.0 THE CULTURAL HERITAGE OF THE STUDY AREA

2.1 General

2.1.1 The area of Juriction 7 is on the Gault Clay. This zone is an attractive settlement area as the heavy clay soils are moderated by proximity to the well drained Greensand and Chalk. There is a well-defined spring line at the juriction of Chalk and Clay where settlements may be expected from early periods.

2.2 Palaeolithic (up to c. 8,000 BC).

2.2.1 Outside the Thames Valley zone palaeolithic finds are generally chance disceveries of tools in river gravels. Work around the turn of the century, however, demonstrated that the Lower Greensand may produce more concentrations of finds if surveyed intensively. Nene is known from the area of the current proposal.

2.3 Mesolithic (c. 8,000 BC - c. 4,500 BC).

2.3.1 There is little known about the occupation of this part of Surrey in the mesolithic period. The people of this time were hunter-gatherers, probably nomadic and territorial. The High Weald is assumed to have been discouragingly densely forested although, increasingly, the sandier areas are producing evidence of mesolithic presence. Despite a paucity of evidence from the systematic study of this period in the area, it is likely that the drier sandy areas and the Downs were more utilised than the wetter clays. Mesolithic flintwork has been recorded about 800m south of the M25 at the earthwork in Big Pickle field (SMR 3092).

2.4 Neolithic (c. 4,500 BC - 2,000 BC).

2.4.1 This is the period when the first farmers systematically began to clear the lighter areas of the woodland for pasture and arable. Permanent settlements were established for the first time. The most attractive areas for the primitive cultivation techniques then available were the lighter, well drained soils on the Chalk and sandy rocks, although the Blackheath, Woolwich and Thanet beds would quickly have become exhausted, infertile heathland. The Wealden Forest would have been used for forage, fuel, grazing and timber resources generally. Settlement probably

began to concentrate at the foot of the Downs in the Holmesdale valley at this period. Prehistoric flint tools and flakes were discovered during the construction of the M25 at the western end of the current proposals (SMR 3522).

2.5 Bronze age (c. 2,000 BC - c. 500 BC).

2.5.1 Clearance of land for agriculture continued in the bronze age. The climatic optimum of the early and middle parts of the period meant that land which is now marginal or uncultivatable may have been farmed then. The Wealden forest and its geology generally appears to have offered considerable difficulties to early farmers, and although the upland settlements at the foot of the North Downs may have spread south into the Weald, there is little evidence of intensive exploitation. The later part of the bronze age probably saw a climatic deterioration, with a consequent shrinkage of the cultivated area. The stream valleys may have become waterlogged at this period. A bronze age barrow survives to the west of Godstone (SMR 1230, SM21067), and pottery from the period was found on the earthwork in Big Pickle (SMR 3093).

2.6 Iron Age (c. 500 BC - AD 50).

- 2.6.1 The climatic downturn of the late Bronze Age continued into the Iron Age, and may have been instrumental in the rise of territorial competition which appears to be characteristic of the period. The best-known Iron Age monuments are hillforts, and these often heavily defended sites have their smaller counterpart in defended farmsteads. There are hillforts on the North Downs, and several have been located on the sandstone ridges of the Weald. The nearest is at White Hill, just to the north west of the proposed area (SMR 1233, SM27).
- 2.6.2 It is possible that the Ridgeway on the Downs and the Pilgrims' Way were established by this period. The area was important because of its proximity to the Roman province of Gaul. Canterbury was a major pre-Roman settlement an Oppidium which was the centre of east Kent economic and military activity. There was evidence of iron age domestic activity discovered during the construction of Junction 6.

2.7 The Romans (AD c. 50 - c. 400).

2.7.1 The Roman invasion of Britain was spearheaded through Kent in AD 43 from a landing at Richborough. Later this Roman port was linked to Rochester and London via Watling Street which forms part of the modern A2. The major London-Lewes Roman road crosses the M25 at Clacket Lane Service Station and a little west of this at Titsey is a complex of Roman features near the intersection of the Roman London-Lewes road and the Ridgeway. Another lesser Roman Road is crossed by the M25 between Godstone and Caterham at Junction 6 (SMR 3102). Finds of Roman pottery were recorded at Junction 6 during the construction of the M25 (SMR 1989, SMR 4254)

2.8 Early medieval (AD c. 400 - 1066).

- 2.8.1 South east Engliand proved to be the beachhead for invasion again in the century after the collapse of Roman rule. The tribes from the adjacent part of Europe the Jutes, Angles and Saxons settled in the south east. There is still considerable debate about the degree to which the area was already agriculturally developed at this time, but recent studies have suggested that the Downs were predominantly pastoral and the Weald forested. The area of Junction 6 is at the meeting of these zones. Settlement was centred on river and springhead settlements at the foot of the Downs scarp. Some estates survive as parkland or historic gardens.
- 2.8.2 The River Darent gap in the North Downs linked settlements on either side of the hills and the Pilgrims' Way became the principle east-west route, replacing the prehistoric Ridgeway and reflecting the emphasis of settlement on the more fertile area on the north side of the Eden/Darent Valley. There is evidence for activity in this period in the study area about 800m south at the earthwork in Big Pickle field. The Pilgrims Way passes about 400-500m to the north of the M25 at this point.

2.9 Later Medieval (AD 1066-1500)

2.9.1 The period after the Norman conquest saw the growth of nucleated villages with feudal land management. Caterham and Tylers Green were established by this time, and a scheduled moated site and fish ponds to the south east of Junction 6 (SMR 1242, SM12755) are the site of medieval residence. Some medieval pottery and a building associated with it (SMR 3104) was destroyed by the M25 some 500m east of Junction 6. Tudor pottery was also discovered north

of North Park Farm (SMR 3523), and 16th century foundations have been located at Big Pickle (SMR 1222 SMR 3095) and Hopgarden Shaw (SMR 2614).

2.10 Post Medieval/Modern: AD1500 onwards

2.10.1 The post medieval period has seen the growth of settlement along the valley, and the development of communications, culminating in the M25. The mobilisation centre, Fosterdown Fort is about 500m north of the M25 (SMR 1238, SM56). The area was mined and quarried for firestone and hearthstone in the 19th and early 20th century, using the pillar and stall method (SMR 3988, 3989). There are an estimated 8km of underground passages in the Godstone/Caterham area. There were entrances both north and south of Junction 6, but they have been backfilled and are now invisible.

3.0 PREDICTED EFFECTS OF THE PROPOSALS

3.1 General Assessment Methodology

- 3.1.1 This section describes the known and petential archaeological features which will be, or are likely to be, encountered aleng the route. The data from the SMRs, English Heritage Aerial photographs and field survey are combined to produce this assessment (Appendix 1). The assessment methodology is set out in Appendix 2.
- 3.1.2 The impact of the proposals on cultural heritage could come from three principal sources:
 - i) physical darnage through soil disturbance in the course of construction;
 - ii) temporary noise and vibration in the period of construction; and
 - iii) increased noise and vibration generated by the proposed improvements in use.

The effects of these impacts would be different in each case. The physical destruction of archaeological features would result in permanent loss of material, noise could result in temporary or permanent loss of amenity, and vibration could cause structural damage. The differing effects would be experienced by different categories of cultural heritage features. Below ground features and standing structures may be affected by earthmoving, whereas standing structures could be affected by vibration. Noise may adversely affect the experience of observers of cultural heritage features.

- 3.1.3 The effect on below ground features will depend upon the character of the archaeology and the extent of the disturbance which may impact upon it. In the proposed improvements the impact would be from the excavation of foundation trenches for retaining walls to support steepened or widened embankments. These would be relatively narrow, linear disturbances. Any archaeological features affected could experience high impact although the effect on sites overall is likely to be less significant.
- 3.1.4 There would be a minimal effect on historic structures and Conservation Areas.



3.1.5 Conservation Areas would experience the same type of impacts as Listed Buildings i.e. noise and vibrations. There would be an increased effect during the construction period from these impacts and also potentially from construction traffic and any temporary traffic management systems which may be required. None of the Conservation Areas is closer to the motorway than 250 metres, and as the fenceline is not to be changed, there would be negligible effects once the improvements were completed.

3.2 Sites on the Route

- 3.2.1 The known archaeology of the study area is used to determine the archaeological potential of the areas which may suffer impact due to the safety improvement proposals. This discussion should be read in conjunction with Table 1, in which the effects are outlined.
- 3.2.2 At the western end of the proposal, there might be additional impact on the setting of SM 27 (SMR 1233), an iron age hill fort. This site is partly shielded by trees, and the effect of the proposal on the SM's setting would be minimal.
- 3.2.3 Sites and Monuments Records (SMR's) 2614, 1222, 3092, 3093, 3094 and 3095 are all of average importance but no additional impacts would occur, giving a zero effect.
- 3.2.4 The locations of SMR's 3522, (prehistoric tools) and 3523, (Tudor pottery), have been destroyed by the original motorway construction, but it is possible that associated artefacts lie close by. This area might be subject to additional disturbance of the original ground surface. Data from geotechnical trial pits may help ascertain whether the original ground surface is intact.
- 3.2.5 SAM 156, Fosterdown Fort would be subject to minimal effect on its setting only, due to a potential increase in noise. There would be no effect on SM 20167, a bowl barrow in Godstone a kilometre to the south.
- 3.2.6 The Roman road, SMR 3102 has been destroyed at its intersection with the M25. Data from Geotechnical trial pits have shown that no evidence of this remains, the original ground surface having been destroyed. The find spot of SMR 3688, iron age artefacts, has been destroyed but there is potential for associated archaeological activity in the vicinity. It is possible that, if any of the original ground surface remains intact nearby, there could be an impact and a possible effect on archaeology. The same applies to SMR 1989 (Roman pottery).

- 3.2.7 There would be a minimal effect on the settings of Listed Buildings 116 and 117 about 500m north.
- 3.2.8 The Pilgrim's Way and Ridgeway which run east-west along the North Downs would not be directly affected by the safety proposals, and a minimal effect on setting is predicted.

Table 1: Summary of Effects

SMR No	Importance	Impact	Effect
1233 (SAM 27)	Major	Low, on setting only	Minimal
2614	Average	None	Zero
1222	Average	None	Zero
3092	Average	None	Zero
3093	Average	None	Zero
3094	Average	None	Zero
3095	Average	None	Zeгo
3522	Minor	Unknown	Possible
3523	Minor	Unknown	Possible
1238 (SAM 156)	Major	Low, on setting only	Minimal
123● (SAM 20167)	Average	None	Zero
3688	Min●r	Unknown	Possible
3102	Average	Zero	Zero
1989	Minor	Unknown	Possible
LB 117	Average	Low, on setting only	Minimal
LB 116	Average	Low, on setting only	Minimal
Pilgrims way	Average	Low, on setting only	Minimal
Ridgeway	Average	Low, on setting only	Minimal
3988	Average	None	Zero
3989	Average	None	Zero
4120	Minor	None	Zero
4254	Average	None	Zero

4.0 MITIGATION AND CONCLUSION

- 4.1 Mitigation is the action required to safeguard the cultural heritage, taking into account any protective measures already incorporated into the proposals. The settings of above-ground structures (Listed Buildings) are protected by the landscaping and there is a negligible effect from noise and vibration.
- 4.2 Mitigation of the effect on below-ground features can be achieved in a number of ways, as set out below:
 - i) avoidance;
 - ii) construction methods which do not impinge on significant deposits;
 - iii) rescue excavation and recording in advance of construction; and
 - iv) salvage recording during construction.

The choice of these options would depend upon the character of the below-ground features and the details of the engineering structures which might affect them. From the cultural heritage point of view the options are in order of decreasing preference.

4.3 None of the potential archaeological sites which might be affected by the proposals is of such significance or would experience sufficient of an impact to require pre-emptive excavation and recording. The areas where archaeology may survive (under embankments and in areas at grade) should be monitored by an archaeologist during the construction phase of the project (see letter from Surrey County Archaeologist, Appendix 3) and any significant archaeology recorded.

FIGURES

APPENDIX 1

SMR ENTRIES LISTED BUILDINGS SCHEDULED MONUMENTS

SURREY SMR (From West to East from Junction 7)

SMR Number	NGRTQ	Site Type	Period	Comments
1233	33155325	Camp/hillfort	Iron Age	SAM 2/
2614	33475207	Building foundations	Medieval + C16th	
1222	33475215	Earthworks	Medieval	Foundations of C16th wall and dry square moat
3092	33475215	Flint implements	Mesolithic	
3093	33475213	Pottery	Bronze Age	
3094	33475213	Pottery	Anglo Saxon	
3095	33475213	Building	Post-medieval	
3522	3370052700	Flint tools and flakes	Prehistoric	
3523	3410052600	Pottery	Ludor	1 sherd
1238	34415334	F●rt	C19th	Fosterdown fort SAM 156
1230	34825184	Bowl barrew	Bronze Age	SAM 21067
3688	35115298	Flint implements Iron Age pot, bone, tools	Iron Age	Destroyed
3102	351529	Road	Rornan	Destroyed at intersection with M25
1989	35352 9	Pottery	R∙man	
1242	35605255	Moat and fishponds	Medieval	SAM no: 12755
3103	357528	Pottery	Roman	Destroyed
3104	357528	Long, narrow building and pottery	Medieval	Destroyed
3988	34825253	Quarry/Mine	Post-med	Entrances and surface teatures destroyed
3989	34875360	Quarry/Mine	Post-med	Entrance, destroyed
4120	340524	Coin	Roman	Metal detector find

LISTED BUILDINGS

Parish	No	Status	Description
Godstone	116	Grade II	Quarry Farm House C17th, restored C20th
G∙dstone	117	Grade II	Barn 10 yards north of Quarry Farm, C18th much altered

SCHEDULED MONUMENTS

Number	Monument	Nat. Grid ref
20167	Bowl barrow at the north end of Hilly Field, Tylers Green	TQ 34825184
156	Fosterdown Fort, 19th Century	TQ34405330
12755	Medieval moated site and fish ponds, Flower Lane	TQ35635256
27	Fort at War Coppice, iron age	T ● 33005330

APPENDIX 2

ASSESSMENT METHODOLOGY

- 1. An assessment has been made of the significance of the archaeological features. This is based upon the EH criteria used to assess monuments for SAM designation within the Monuments Protection Programme (MPP). The features considered here are not necessarily of the quality which would qualify them as SAMs but the same criteria are useful guidelines for assessing the significance of any site, using professional judgement. The EH criteria are:
 - period: all types of monuments that characterise a category or period should be considered for preservation;
 - ii) rarity: there are some monument categories which in certain periods are so scarce that all surviving examples which still retain some archaeological potential, should be preserved. In general, however, a selection must be made which portrays the typical and commonplace as well as the rare. This process should take account of all aspects of the distribution of a particular class of monument, both in a national and regional context;
 - iii) documentation: the significance of a monument may be enhanced by the existence of records of previous investigation or, in the case of more recent monuments, by the supporting evidence of contemporary written records;
 - iv) group value: the value of a single monument (such as a field system) may be greatly enhanced by its association with related contemporary monuments of different periods. In some cases, it is preferable to protect the complete group of monuments, including associated and adjacent land, rather than to protect isolated monuments within the group;
 - v) survival condition: the survival of a monument's archaeological potential both above and below ground is a particularly important consideration and should be reassessed in relation to its present condition and surviving features;
 - vi) fragility/vulnerability: highly important archaeological evidence from some field monuments can be destroyed by a single ploughing or unsympathetic treatment. Vulnerable monuments of this nature would benefit particularly from the statutory protection which scheduling confers. There are also standing structures of particular form or complexity whose value can again be severely reduced by neglect or careless treatment and which are similarly well suited to protection by scheduled monument legislation, even if these structures are already listed historic buildings;

- vii) diversity: some monuments may be selected for scheduling because they possess a combination of high quality features, others because of a single important attribute;
- viii) potential: on occasion, the nature of the evidence cannot be specified precisely, but it may still be possible to document reasons for anticipating its existence and importance and so to demonstrate the justification for scheduling. This is usually confined to sites rather than upstanding monuments.
- 2. The assessment of the EFFECT of a proposal will depend upon the assessment of the IMPORTANCE of the features and sites affected, and the degree of IMPACT of the proposals. There are occasions when too little is known to make informed judgements and an assessment of RISK is all that can be offered. The definitions of these terms and their categories are set out below.
- 3. IMPORTANCE: there is no standard scale of importance used in cultural heritage studies, with various systems in use by different agencies. To avoid the official implications of such terms as "National", "County" and "Local" in this report the following categories are used:

Major: the highest status of site e.g. SAMs, Listed Buildings Grade I and II*, using the

DoE criteria to assist in the judgement;

Average: the bulk of sites with reasonable evidence of occupation, ritual, industry, etc.,

Listed Buildings Grade II;

Minor: sites with some evidence of human activity, but in a fragmentary or poor state,

buildings of local importance;

Unimportant: destroyed, non-antiquities, random stray finds, buildings of no merit;

Uncertain: insufficient evidence available to judge importance.

4. IMPACT: as with importance there is no agreed terminology or definition concerning the degree of Impact. It cannot be a simple percentage calculation of the proportion of a feature etc, which would be destroyed because some parts of a site may be more important than others, or partial destruction may lead to the loss of all significance. The assessment of the degree of impact must be as qualitative as the judgement of importance. The following terms are used in this report:

High: loss of all or the majority of significant features, such that the site or

building is effectively destroyed or seriously damaged;

Medium: loss of sufficient part of sites or encroachment on their setting such that

their integrity is compromised, or enough damage to buildings' fabric or

ambience to impair their enjoyment, understanding or academic

potential;

Low:

slight damage or encroachment, such that sites or buildings and their

settings are largely retained;

None:

no discernible impact;

Unknown;

there is insufficient information regarding the design of the proposal or

the extent, location or layout of the feature to enable judgement to be

made.

5. EFFECT: the effect of a proposal is a combination of the previous two judgements. The effect of a high impact on a minor site is obviously different to that of a high impact on a major site. Again there is no standardised terminology to categorise these judgements; this report uses the following:

Maximum:

high impact on a major site;

Very Severe:

medium impact on major site, or, high impact on an average site;

Severe:

low to medium impact on a major site, medium impact on an average site, or

high to medium impact on a minor/average site;

Moderate:

low impact on a major site ranging to high impact on a minor site;

Minimal:

low impact on average site to minor impact on medium site;

None:

no impact or non-site.

3.1.7 RISK: this is an assessment of the likelihood and the severity of an effect in situations where either the importance of the site or the degree of impact is unknown. If both are unknown no judgement can be offered, but there may be other evidence which suggests potential risk. The risk refers to the probability that the proposal would cause a significant effect, where significant means sufficient to warrant mitigation measures. The following terms are used in this report:

Very Probable: High impact on a site where the importance is uncertain or a major site where

the impact is unknown;

Probable: Medium impact on a site where the importance is uncertain, or, an average site

where the impact is unknown;

Possible: low/medium impact on a site where the importance is uncertain, or, an average/

minor site where the impact is unknown;

Unlikely: low/no impact on a site of uncertain importance, or, an unknown impact on a

site of minor/no importance;

Potential: used when evidence from surrounding areas or similar situations would suggest

that features might exist.

Table 1. Matrix of Effects

	IMPORTANCE				RISK	
		MAJOR	AVERAGE	MINOR	UNIMPORT ANT	UNCERTAIN
I M	HIGH					V.PR●BABLE
P	MEDIUM					PROBABI <u>E</u>
A C	L●W					POSSIBLE
Т	NONE	<u> </u>		7 Mg		UNLIKELY
	UNKNOWN	V PROBABL E	PROBABLE	P●SSIBLE	UNLIKELY	POTENTIAL

Key to Matrix

MAXIMUM	Santa (Carlos)	SEVERE	 MINIMAL.
VERY SEVERE		MODERATE	ZERO

APPENDIX 3

CONSULTEES RESPONSES

