

From: [REDACTED]
To: [A303 Stonehenge](#)
Subject: RE: A303 Amesbury to Berwick Down (TR010025)
Date: 17 April 2019 13:01:33
Attachments: [Highways England consultation response.docx](#)
[representations.docx](#)
[Appendix 1.pdf](#)

Dear Sir/Madam

Accompanied site visit reference 20019751

I act on behalf of Amesbury Abbey Group Limited and I write to make a request that Accompanied Site Inspection visits Amesbury Abbey in order to assess the impact of the proposed road works, and in particular the flyover, on the grade 1 listed Abbey and its parkland which is a Registered Park and Garden, in order to assess the impact on the setting of the many heritage assets and also the impact on amenity of the residents of the Abbey and the Mew Houses.

I would refer you to my letter in response to the consultation of the 20/4/2018 which is attached which sets out the full impacts for the development proposed on my client's property and my summary of issues submitted with our application to become an interested party.

The archaeological site Blick Mead is within the grounds and ownership of the Amesbury Abbey Group and the archaeological interests are being separately represented by a different legal team. I understand that they may be requesting that the site visit take place in early June when excavations will have started and there will be an active dig to see which will be more informative than a visit to an area of woodland.

Consequently you may prefer to combine the two site visits.

Kind regards

Tracey Merrett

From: A303 Stonehenge [mailto:A303Stonehenge@planninginspectorate.gov.uk]
Sent: 11 April 2019 14:16
To: Tracey Merrett
Subject: A303 Amesbury to Berwick Down (TR010025)

Dear Sir/ Madam

The Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 8, Rule 13 and Rule 16

Application by Highways England for an Order Granting Development Consent for the A303 Amesbury to Berwick Down

Examination Timetable and procedure

Your reference: 20019751

Dear Sir/ Madam

Please find below a website link to the Rule 8 letter giving notice of the Examination Timetable and other Procedurals Decisions made by the Examining Authority at, or following, the Preliminary Meeting.

This letter includes a number of important annexes including **Annex E** which provides notice of an **Accompanied Site Inspection** and **Open Floor Hearings** to be held on 21, 22 and 23 May 2019.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000561-TR010025%20Rule%208%20cover%20-%20FINAL.pdf>

If this link does not open automatically, please cut and paste it into your browser.

Yours faithfully

A303 Amesbury to Berwick Down Case Team
National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Web: <https://infrastructure.planninginspectorate.gov.uk/> (National Infrastructure Planning)

Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: [@PINSgov](https://twitter.com/PINSgov)

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Highways England
Complex Infrastructure Programme
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6 HA
20th April 2018

Dear Sirs

**Planning Act 2008 Section 42
Stonehenge Development Consent Order pre Application Consultation
Response**

I represent Amesbury Abbey Group who are the owners of Amesbury Abbey, Grade I listed building and 8 ha of registered park and gardens Grade II*. The house and grounds lie to the South West of the Countess Roundabout and are in part immediately adjacent to the A303. Amesbury Abbey is a nursing and residential care home with 37 apartments and it also includes Abbey Mews which are 32 purpose built apartments for independent living, 4 flats in the Abbey and 3 separate dwellings in the grounds.

Q8: Please provide us with any comments you may have on our proposals for the A303 flyover at Countess Roundabout

1. IMPACT ON HERITAGE ASSETS

The national policy is set out in the National Policy Statement for National Networks

5.131 *When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be.*

Significance can be harmed through development within its setting. Given that heritage assets are irreplaceable, harm or loss affecting any designated heritage asset should require clear and convincing justification.

Substantial harm to or loss of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional.

Substantial harm to or loss of designated assets of the highest significance, including World Heritage Sites, Scheduled Monuments, grade I and II Listed Buildings, Registered Battlefields, and grade I and II* Registered Parks and Gardens should be wholly exceptional.*

5.132 *Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development,*

5.133 *Where the proposed development will lead to substantial harm to the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm,*

1)Amesbury Abbey

The Abbey is a Grade I listed building, a heritage asset of the highest significance, it is on the site of the Benedictine Abbey of Amesbury and the current house was built in 1834 designed by Thomas Hopper for the Antrobus family. The Abbey will be permanently adversely affected by this development in such close proximity. Visually the development is incapable of screening and the flyover will be visible from the house.

Substantial harm to or loss of designated assets of the highest significance, including World Heritage Sites, Scheduled Monuments, grade I and II Listed Buildings, Registered Battlefields, and grade I and II* Registered Parks and Gardens should be wholly exceptional.*

Unquestionably this development will cause substantial harm and the test will be whether the harm is necessary in order to deliver the alleged substantial benefits to the World Heritage Site, Stonehenge.

2)Amesbury Park registered Historic park and garden

The pleasure grounds of circa 8ha are listed Grade II* dating from C18 and C19 They were designed by Charles Bridgeman in 1738 and are one of the few remaining Bridgeman gardens remaining .

3) Structures and Scheduled Ancient Monuments within Amesbury Park

Baluster Bridge listed Grade II* built by Sir William Chambers in 1775 .
The Chinese House or Chinese Temple listed Grade II*
Vespian's Camp an Iron Age Hill Fort which is a Scheduled Ancient Monument.
Gays Cave Listed Grade II* a grotto.

4)Blick Mead

Blick Mead is an undesignated heritage asset of national importance in its own right. Archeologists lead by Professor David Jacques (Professorial Research Fellow in Archaeology at the University of Buckingham) have discovered the following on this site

- the oldest dwelling and occupation area in the WHS, tightly dated by five radio carbon dates to c. 4000 BC;
- the earliest example of a recorded journey in Great Britain, dated to c. 5500 BC;
- the place the communities lived in who built the first monuments on the Stonehenge Knoll just after the Ice Age. This is something which has evaded detection by archaeologists for over two centuries; and

- the longest dated sequence for a settlement of Mesolithic date (the era before the time of Stonehenge) in Great Britain, spanning the 8th and 5th millennia BC, and a potential contact between the first farmers and last hunter gatherers in the Stonehenge landscape around 4000BC.

5) Setting

The setting of heritage assets are to be negatively affected by this development in their background both visually and by traffic noise and settings are protected themselves.

An assessment of the impact of the work on the setting of the building and the other heritage assets must be undertaken in accordance with Historic England's guidance HE2015 Good Practice Advice in Planning Note 3.

There will be a significant permanent adverse effect on the setting of the above heritage assets.

6) Dark Skies

The impact of the scheme upon dark skies as they are part of the setting for the Outstanding Universal Value of the world Heritage Site and lighting schemes must be taken into account.

2. LANDSCAPE AND VISUAL IMPACT

There is no ability to mitigate the landscape and visual impact of an 8 metre high flyover from Amesbury Abbey or its park. To put this into context 8m is the equivalent height of a three storey building, and to this, add the height of a lorry. No land is being acquired to enable any planting or mitigating landscaping.

Also the ability to mitigate the impact and visibility of an 8 metre high flyover and 4-5 metre high lorries traveling on it from only 60m away is highly unlikely even you had acquired the land to carry out the planting.

The computer generated image of the flyover provided is clearly misleading as it shows a flyover and white van at such a low level that the surrounding trees would have to be over 100 foot tall.

The road is visible at present especially the lorries and vans, also the screening effect of the existing woodland is not sufficient and in particular in the winter months the road is clearly visible from the Abbey and its grounds.

Significant permanent adverse effects will ensue, impacts from such intrusive development are hard to mitigate.

3. AIR QUALITY

Although you have assumed that the improving vehicle exhaust emissions standards are likely to be greater than any additional growth in traffic in subsequent years. It is agreed that the levels of traffic flow will increase and there is concern regarding the increased exposure to nitrogen dioxide close to the Countess Roundabout and the flyover.

In particular the Abbey is home to approximately 87 elderly people and houses a large number of staff. Most residents use the grounds for recreation and rest and

will be in close proximity to the flyover. The image of the flyover prepared by yourselves shows the bench next to the river which is approximately 60 metres from the road, and there are many other resting places in the park where the residents will sit. Together with the occupants of Bowles Hatches and Diana's House the residents of the abbey are the nearest human receptors to the flyover.

4.NOISE AND VIBRAITON

My clients are instructing Acoustic specialists to advise on the baseline noise levels and to provide an independent assessment of the effects on the Abbey and its grounds. This is of primary significance to its business which sells accommodation based upon the Abbey's beauty tranquility and grounds all of which will be irreparability detrimentally effected if the proposed works go ahead.

The elevation of the traffic will increase the level of noise and the distance it will travel this is accepted by Highways England on p25 of the Environmental report summary. It is also accepted that there will be an increase in the volume of traffic. Noise mitigation works such as screening cannot take place without further detrimental effect of a screen which would have to be 8m high plus the height of a lorry to be effective, which visually would be unacceptable. The typical lorry typically used on a trunk road is an articulated lorry the height of which varies between 4m and 5 m the maximum clearance on public road being 5 m. This would necessitate a screen of 12m in height at least.

Vibration effects should be assessed for the Abbey and Blick Mead, currently only properties within 40m of the road works are to be assessed.

Details of all noise and vibration monitoring points should be provided and several should be within the grounds of Amesbury Abbey (one being at Blick Mead) and one should be within the building itself to ensure the preservation of the fabric of the building.

All assessments of traffic impacts should take into consideration the seasonal variation in traffic flows on the A303 as it is the primary through route for journeys to the South West.

Details of all properties which your consultants consider to require noise insulation works should be supplied.

5.ROAD DRAINAGE AND THE WATER ENVIRONMENT

Two issues to raise firstly the integrity of the river Avon SAC, the concerns relate to the pollution impacts of surface water run-off and groundwater impacts in terms of changes in water table as a result of ground works.

This is of particular concern bearing in mind that the River Avon is less than 50 m from the boundaries of the works and the other watercourses in the area are adjacent to the road itself where is vitally important that there is not even a temporary adverse effect as a result of changes to the water environment in the area.

The changes to local drainage caused by the proposed flyover may alter the water table at Blick Mead irreparably the consequence of this would be that the archaeology at Blick Mead may be lost forever if the 'water table' in which it is

preserved is not maintained. This water table is an important reason why the archaeology at Blick Mead is so well preserved and consequently so valuable. This is because the water table keeps organic matter in a deoxygenated state preventing decay.

The controlled waters assessment should include unlicensed wells and springs that do not have a license but may be significantly affected. There is a spring in the grounds of the Abbey and the scheme's impact on this should be assessed.

6.CONSTRUCTION IMPACTS

Most importantly the effect of the construction works on the flow of traffic is vital to my client's business. It is imperative that staff are able to get to work on time. Currently it is estimated that there are 1,824 vehicle movements to and from the Abbey every week. I enclose at Appendix 1 a breakdown of this figure between staff, residents, visitors, deliveries and the Physiotherapy Clinic on site.

We need to be pre-consulted on any proposed road closures or diversions, alternative access arrangements and hours of working.

We need to ensure that the arrival and departure of staff is not disrupted through full advance consultation by yourselves at appropriate times and that we are consulted on the draft construction traffic management plan. The late arrival of a nurse or a care assistant could put lives at risk.

7.CUMULATIVE EFFECTS

It is important that the cumulative effects for the particularly sensitive receptor Amesbury Abbey are considered. The combination of the effects of noise dust vibration air-quality lighting etc must be considered within the environmental statement.

8. IMPACT ON THE AMESBURY ABBEY (CARE HOME) BUSINESS

In the Scoping Report the presence of this business is not acknowledged. In para 6.8.28 it states that there are no business premises lying directly on the alignment of the scheme, Amesbury Abbey is directly adjacent to the A303 and in close proximity to the roundabout and proposed flyover.

The detrimental effects discussed above due to the increase in traffic the development itself and the disruption will all have a permanent detrimental effect on the business the value of the properties and the residential amenity.

The noise vibration and air quality impact may impact on the health of residents. It will undoubtedly reduce their residential amenity.

1.IMPACT ON HERITAGE ASSETS

Amesbury Abbey is a Grade I listed building, a heritage asset of the highest significance which will be permanently adversely affected by this development. The development is incapable of screening and the flyover will be visible from the house.

Amesbury Park registered Historic park and garden the pleasure grounds of circa 8ha are listed Grade II*.

Baluster Bridge listed Grade II*built.

The Chinese House or Chinese Temple listed Grade II*

Vespians Camp an Iron Age Hill Fort which is a Scheduled Ancient Monument.

Gays Cave Listed Grade II*.

.Blick Mead is an undesignated heritage asset of national importance.

The development will cause substantial harm to the above assets and to their setting both visually and by traffic noise.

The scheme will have a negative impact upon dark skies which are part of the setting for the Outstanding Universal Value of the World Heritage Site.

2. LANDSCAPE AND VISUAL IMPACT

There is no ability to mitigate the landscape and visual impact of an 8 metre high flyover plus 4m lorries from Amesbury Abbey or its park. No land is being acquired to enable any planting or mitigating landscaping.

Significant permanent adverse effects will be caused.

3.AIR QUALITY

The scheme will result in increased exposure to nitrogen dioxide close to the Countess Roundabout and the flyover.

The Abbey is home to approximately 87 elderly people and houses a large number of staff. Most residents use the grounds for recreation and rest and there will be a permanent detrimental effect on air quality.

4.NOISE AND VIBRATION

My clients business relies on the Abbey's beauty, tranquillity and grounds all of which will be irreparably and detrimentally effected if the scheme goes ahead.

The elevation of the traffic will increase the level of noise and the distance it will travel, this is accepted by Highways England. It is also accepted that there will be an increase in the volume of traffic.

No noise mitigation works are proposed.

Vibration effects will be detrimental for the Abbey and Blick Mead.

5.ROAD DRAINAGE AND THE WATER ENVIRONMENT

Concerns regarding the river Avon SAC and Blick Mead, relating to the pollution impacts of surface water run-off and groundwater impacts in terms of changes in water table as a result of ground works, archaeology at Blick Mead may be lost forever.

The Environmental Statement conclusion that there will be no adverse impact on Blick Mead is not agreed. Important remains have already been destroyed by the unauthorised drilling of a borehole.

6.CONSTRUCTION IMPACTS

The effect on the flow of traffic, it is imperative that staff are able to get to work on time, there are 1,824 weekly vehicle movements. The late arrival of staff could put lives at risk.

7.CUMULATIVE EFFECTS

The combination of the effects of noise, dust, vibration, air-quality, lighting, water table etc must be considered.

We do not believe that the Secretary of State has adequate environmental information to enable him to make a decision on this application.

Movements on/off site for Staff/Visitors to Amesbury Abbey

Data recorded over one week	Ins/Outs
<u>Staff</u>	
CareBlox data recording staff - whole site	768
Group Staff - travelling	
Domestics	40
Managers (est 4 managers per day)	40
Staff offsite or out for lunch - estimated	100
Estimated weekly staff Ins/Outs	<u>948</u>
<u>Abbey Mews</u>	
Visitors	124
Residents going out	236
Estimated weekly Ins/Outs	<u>360</u>
<u>Amesbury Abbey</u>	
Deliveries	92
Visitors	244
Estimated weekly Ins/Outs	<u>336</u>
<u>Physiotherapy</u>	
Client visits	160
Staff	20
	<u>180</u>
Total estimated weekly Ins/Outs	<u>1824</u>