

A303 Amesbury to Berwick Down Case Team
National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN
Reference : 20019751
30th August 2019

Dear Sirs

Planning Act 2008

**Application by Highways England for an Order Granting Development Consent for the A303 Amesbury to Berwick Down
Amesbury Abbey Group Limited's Response to Highways Agency's Comments**

I represent Amesbury Abbey Group who are the owners of Amesbury Abbey, Grade I listed building and 8 ha of registered park and gardens Amesbury Abbey Park Grade II*.

Section 26

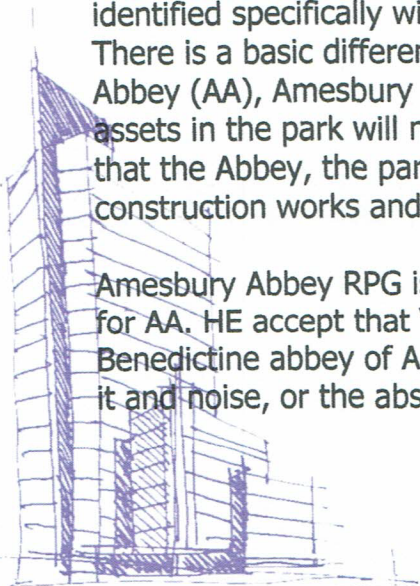
Amesbury Abbey Group Limited (REP 2-048 to REP 2-051 and AS-036)

Para 26.1 Key issue that cumulative effects for Amesbury Abbey have not been considered.

The Highways England response is (para26.1.3) that Amesbury Abbey is not anticipated to experience cumulative or combined impacts and therefore was not identified specifically within chapter 15.

There is a basic difference between the Highways Agency's belief that Amesbury Abbey (AA), Amesbury Abbey Registered Park and Garden (RPG) and the heritage assets in the park will not be affected and the owners of Amesbury Abbey's belief that the Abbey, the park and its heritage assets will be seriously affected by the construction works and the operation of the flyover.

Amesbury Abbey RPG is not only relevant in its own capacity but also as the setting for AA. HE accept that "The park was designed as the secluded surroundings of the Benedictine abbey of Amesbury and subsequently of the private house that replaced it and noise, or the absence of noise, is a significant feature of its setting".



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Consequently noise will affect the significance of this asset in its capacity as the setting of AA as well as harming its own significance.

The potential cumulative impacts are considered within the zone of influence , Amesbury Abbey is within the zone of influence for cultural heritage, construction and operation, landscape and visual impact, biodiversity, potentially noise and vibration, road drainage and water environment and people and communities. HE accepts that there will be aural and visual effects during the construction phase and that during the operational phase there would be an increase in noise across the majority of the RPG. They accept that the R{G will suffer a change in character of traffic noise as the braking and accelerating would still occur at the approaches to the roundabout under the flyover. And in addition to that will be the increased noise of traffic at a high level on the flyover.

In my previous representations (3.5.19). I have expressed why adverse impacts will be experienced by AA and RPG in relation to cultural heritage, construction and operation, landscape and visual impact, water environment, noise and vibration and people and communities and consequently do not see why the cumulative impact of these significant impacts on High Value Assets should not be considered and taken into account.

Para 26.2

The Countess Flyover will cause substantial harm to AA and AARPG and consequently the proposed development must be wholly exceptional.

HE refer to the ES appendix 6.9 –Cultural Heritage Setting Assessment (APP-218) and refers to part 3.4.10 of this document which concludes that there would be an impact on the northern boundary and the eastern boundary of AARPG as a result of the scheme however that impact would not extend far in to the RPG due to screening provided by the dense vegetation that covers the majority of the northern part of the asset.

We disagree with the above statement as already stated in our previous representations and in particular in the Planting Notes (copy attached) the screening is not dense and has gaps which will allow the flyover and traffic clearly to be seen. Please see the photographs and figures which show the current lack of density of vegetation.

In addition the flyover will extend above the vegetation and be clearly seen from the RPG which should be viewed as an impact on not only the RPG but also on the RPG as the setting for AA which in itself should have protection.

Consequently we also disagree that the settings of the majority assets within the park would be unchanged as a result of the scheme the understanding and appreciation of the assets will be harmed as their setting is harmed.

Para 26.2.13

In response to our criticism that AA and AARPG had not been considered and the only asset considered was Vespians Camp, Highways England have referred to a document Cultural Heritage APP-044, in this there is a factual description of the heritage assets in RPG and reference to AA itself. It points out that Amesbury Abbey RPG is all the land immediately south of the scheme for 1 km up to the Countess

Roundabout, and paragraphs 6.6 .106 and 107 recite the facts of which heritage assets are in the RPG.

Paragraph 6.8.5 b iv states that they will minimise the visual intrusion of the scheme by reusing the existing carriageway, however this is slightly disingenuous as it will do little to minimise the visual intrusion of the flyover.

Paragraph 6.9.20 states that considerable activity will occur in the Countess Roundabout area however there are relatively few heritage assets and those that are present are in the AA RPG and are well screened.

We do not agree, with there is clear visibility between the A303 and the RPG.

References are made to the Outline Environmental Management Plan the references refer to the use of best practicable means in respect of noise etc, it suggests if noise insulation is unsuccessful then offer temporary accommodation. This will not be relevant to the harm caused to heritage assets, other references relate to work outside core hours, and to a noise and vibration management plan which states if the scheme exceeds trigger levels in BS5228 for more than 10 days out of 15 or 14 days in a six month period consider noise insulation works and temporary housing.

These measures will not assist in preventing the damage to the setting of Amesbury Abbey and damage to the RPG and the setting of the heritage assets within it.

They also make reference to the landscaping proposed for the flyover embankments which would be secured through requirement 8 of the draft development consent order. If you turn to the Highways England engineering section drawings TRO10025-27 you will see that the area available for planting on the flyover embankments is a minimal tapered area, slightly less wide than one lane of the road. If you then refer to our drawing produced by Nicholas Pearson Associates ref NPA11083-401 which is a section at chainage 11500, you will see that the embankment planting area is shown at an angle and it will be too narrow to support any large trees or landscaping and will just be adequate for low-level shrub planting details of which have not been put forward or agreed.

References again made by HE to the setting assessment carried out in environmental statement appendix 6.9 where there is an acceptance of an impact on the Northern Boundary and part of the Eastern Boundary of AARPG. Then the subjective judgement is made that the impact would not extend far into the RPG due to screening and consequently no further assessment of any harm is carried out. It at all stops with that subjective judgement which with which we disagree and the comments made above apply.

Paras 26.3

There is an agreed need to have a 12 month survey of the water table at Blick Mead and in the RPG. This has not been completed and only Autumn to Spring has been completed. I query whether without the results there is adequate information of the environmental effects of the scheme to allow the determination of the application for the Development Consent Order.

Despite their statement that Autumn to Spring results give them the extremes of the water table this is not logical, surely the extremes will be a comparison of the results of winter and summer survey. On this basis the fact that they predict no significant environmental effects carries little weight without this significant baseline information. The same concern relates to the spring in AARPG.

Para 26.4

The fact that light won't spill into AARPG is not the only effect, the roundabout and flyover will still be highly visible when lit in what is currently an area of dark skies and will be visible from a long distance and through foliage as a result of its illumination.

In relation to the Scheme's Zone of Theoretical Visibility HE refer to Figure 7.9 APP-087 it is clear from the key to this diagram that this is taking into account the visibility of traffic on the A303 at a height of 4.5 m above the carriageway.

Consequently it is not an assessment of the views from land to the flyover nor of traffic on the flyover just on the existing A303.

Despite admitting that the flyover will be visible from AARPG they have not included it as a visual receptor in the Schedule of Visual Effects, only Bowles Hatches has been included and consequently the landscape impact effect on AARPG has not been taken in to account.

Paras 26.4.25 and 26.4.26 refer to the conclusion following field work on the impact on the AARPG of the flyover that views were limited by the extent of vegetation which is not the same as saying that the flyover will not be visible over and above the vegetation nor through it.

They then go on to say that they only created montages for public views, surely it is essential to judge the landscape impact on the most sensitive receptors to at least find out what the inter visibility will be between these high value and significant heritage assets and the flyover. How can the impact be said to have been assessed without this?

There is no clear representation of the flyover anywhere in the application documents. HE refer in para 26.4.27 to an image of the flyover in the DAS APP -295 figure 6.18, this is an aerial view and gives no idea of what the flyover will look like from the AARPG or anywhere else other than the air.

They also refer to the drawing at sheet 12 of 13 APP-017 this is clearly annotated in the notes "The design and location of the structure is shown here for illustrative purposes only" and as I reported to the Examination it was made clear to me at the Accompanied Site Visit by a HE officer that the height and design of the flyover were not yet known so it is hard to see how its landscape impact can be assessed.

Paras 26.4.34- 26.4.37 discuss the effects that HE have accepted will occur to Local Landscape Character Areas LLCA21 and LLCA 22 which cover the AARPG as significant adverse effects during construction and year one however by year 15 they judge that this will cease to be significant due to existing vegetation being in leaf. The vegetation will be in leaf every year however it is not for Amesbury Abbey Group Limited to carry out planting and you will see from our Planting Notes that the current vegetation does not provide a screen as it is not high enough to screen the flyover and also there is a gap which will allow clear view as and this will not fill naturally without management and planting. Our wish clearly is that the Development Consent Order be refused however if it is to be granted then we would ask that HE pay for the planting and management suggestions to be carried out to provide as good a screen as possible as HE do not have sufficient land to carry out effective screening planting.

Sheet 9 of APP-010 does show minimum heights for the clearance space however it is also annotated to be for illustrative purposes only, nowhere is there a description

of the materials to be used etc and the design and size of the flyover is not limited and consequently is highly likely to be larger than shown.

Para 26.5

HE have accepted temporary significant adverse visual effects on 19 closest properties and temporary significant adverse noise effects during construction on 19 closest properties excluding the Mews and the Abbey where they conclude that a significant adverse effect is not anticipated, but it has not been assessed. Also it is accepted that there will be a significant adverse effect to the LLCA 21 and 22 during construction and for LLCA during 14 years of operation which includes the Mews and AA and the RPG.

Yours faithfully

Tracey Merrett