

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

By Email to A303Stonehenge@planninginspectorate.gov.uk

2 October 2019
/AFH/GF

Dear Sir

**Written Representation to A303 Stonehenge Development Consent Order
Examination Process
NMC-07**

I make this representation of behalf of Lincoln College, Oxford. The College owns land to the north and south of the A303 which is affected by the A303 road improvement scheme.

On behalf of Lincoln College, I write to object to the decision within NMC-07 to delete the private means of access on the western boundary of the block of land known as Earl's Farm Down. This access, which was proposed to link through from Equinox Drive, was identified as PMA 42 and was proposed to mitigate the loss of an access on the western boundary of Earl's Farm Down due to the partial deletion of byway AMES1. Figure 1 identifies this access on an aerial image.

Yesterday, I submitted a similar objection on behalf of Mr Charles Rowland, Lincoln College's agricultural tenant at Earl's Farm Down. The loss of the access shown in Figure 1 will have a significant detrimental impact on Mr Rowland's farming operations, as outlined in his written representation. PMA 42 was a solution agreed with and supported by Lincoln College, Mr Rowland and Highways England (HE) after several months of discussions.

Mr Rowland's written representation sets out the background to the subsequent decision to delete PMA 42. On behalf of the College, I support the comments put forward in the written representation.



Partners:
Neil S Holiday FRICS and Helen Gibbs MRICS FAAV

Consultant:
Charles J D Bates MRICS

Regulated by RICS

Lincoln College is a long-term landlord and could continue to hold the freehold interest in Earl's Farm Down for several hundred years. The landlord's interest in this matter is ensuring the issues raised by the A303 road improvement scheme are mitigated to the satisfaction of its tenant farmer so that the farm holding continues to function in the most effective and advantageous way possible. This is important in the short term to support the existing tenant and in the very long term to ensure the holding remains a good farmable unit and an attractive proposition for potential future tenants, looking forward many generations.

I respectfully request that the possible solutions to this issue put forward in Mr Rowland's representation are taken into account and carefully considered. There is a pressing need for an access to the western boundary of Earl's Farm Down, as set out in Mr Rowland's representation.

I would propose a minor amendment to Mr Rowland's proposed Option 2. This is detailed in Figure 2 and involves taking a short spur off the proposed Equinox Drive to Allington Track link road to join the route of the former byway AMES1. Mr Rowland is supportive of this alternative.

An item at the end of Classmaxi Limited's written summary of the points put forward at Issue Specific Hearing Nine expresses HE's view that PMA 42 would only be suitable for agricultural use. I was concerned to note this, as the access to the land along byway AMES1 currently allows access to be taken by anyone authorised, with or without vehicles, and for all purposes. Any replacement access should not be limited to agriculture only as that would mean the rights provided by the replacement access are lesser than what currently exists.

I am also disappointed with the lack of engagement from HE over this matter and feel due process has not been followed. I learned of the proposal to delete PMA 42 indirectly via Mr Rowland's agent, Mr Howard Smith. Had Mr Smith not been kind enough to alert me, an opportunity to make representations on behalf of Lincoln College may have been missed.

Mr Smith made representations on behalf of Mr Rowland and I made representations on behalf of Lincoln College back in August. Since then, there has been no engagement from HE. I learned of the acceptance of the decision to delete PMA 42 via Mr Rowland and Mr Smith on Friday 30th September.

Given neither landlord nor tenant have had proper consultation, this issue needs to be re-examined.



Partners:
Neil S Holiday FRICS and Helen Gibbs MRICS FAAV

Consultant:
Charles J D Bates MRICS

Regulated by RICS

Laws & Fiennes LLP is a Limited Liability Partnership registered in England & Wales under number OC426916.
Registered Office: Warren Lodge, Broughton, Banbury, Oxfordshire, OX15 5EF
Members of the LLP are referred to as Partners.
Our Privacy Policy is available on our website: www.lawsandfiennes.co.uk

Your faithfully



Alistair Falconer Hall MRICS FAAV
e: alistairfalconerhall@lawsandfiennes.co.uk
m: 07795 807242



Partners:
Neil S Holiday FRICS and Helen Gibbs MRICS FAAV

Consultant:
Charles J D Bates MRICS

Regulated by RICS

Laws & Fiennes LLP is a Limited Liability Partnership registered in England & Wales under number OC426916.
Registered Office: Warren Lodge, Broughton, Banbury, Oxfordshire, OX15 5EF
Members of the LLP are referred to as Partners.
Our Privacy Policy is available on our website: www.lawsandfiennes.co.uk



Figure 1: Existing key access point to Earl's Farm Down

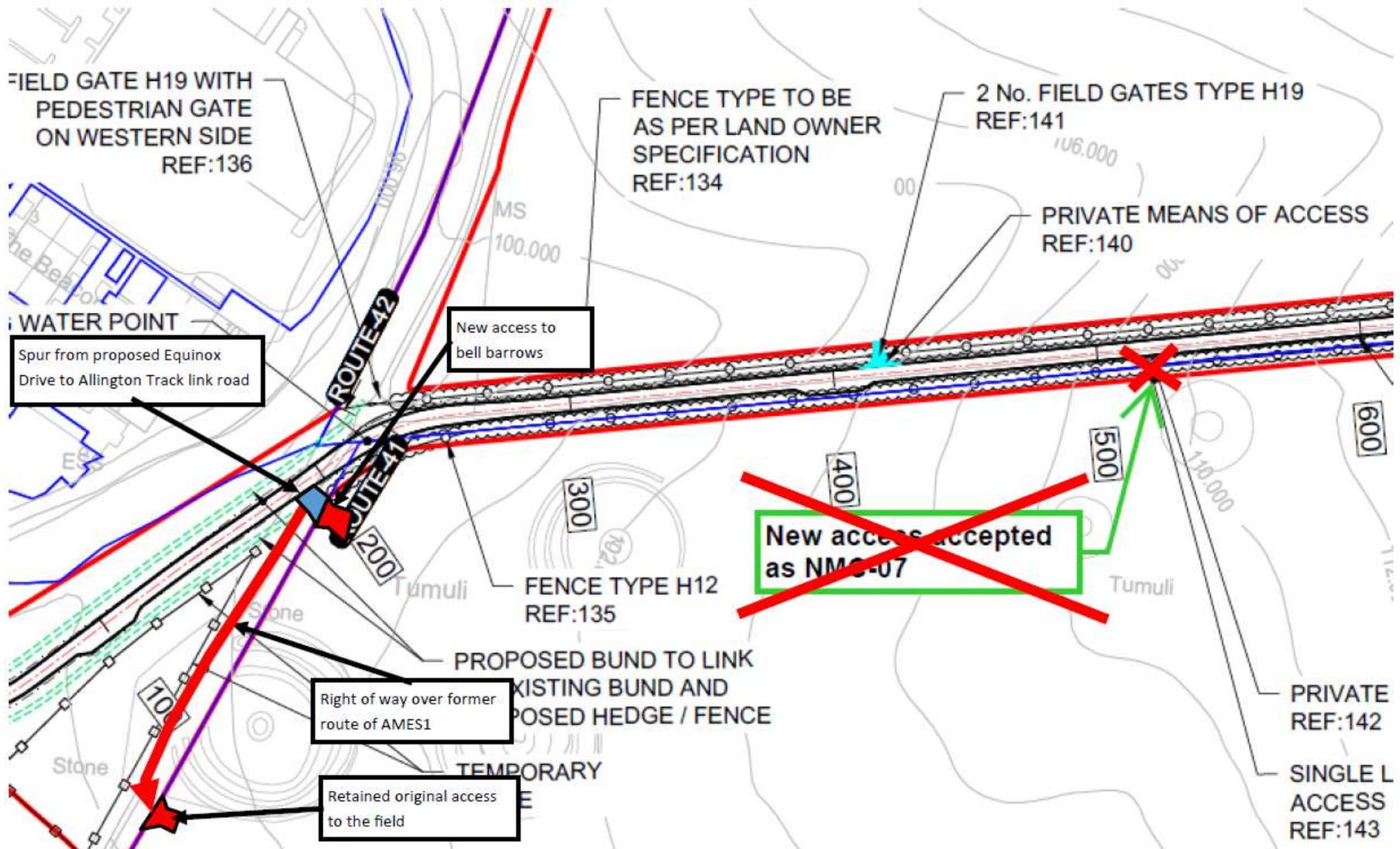


Figure 2: Proposed alternative to Mr Rowland's Option 2, involving the relocation of PMA 41