



Historic England

SOUTH WEST OFFICE

Ms Katherine King
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Direct Dial: 0117 9750671

Our ref: PL00155304

8 September 2017

Dear Ms King

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) - Regulations 10 and 11

Proposed application by Highways England (the Applicant) for an Order granting Development Consent for the proposed A30 Chiverton to Carland Cross (the Proposed Development)

Thank you for your consultation regarding the above.

This scheme has been subject to lengthy and ongoing consultation which has been instrumental in making a number of key adjustments to the original route, however, the decision to provide an offline solution whilst retaining the existing A30 as a local traffic only route does mean that a number of major improvements to designated heritage assets along the route are not possible.

It is our view that any ES should include a dedicated chapter on the historic environment. This chapter should consider designated heritage assets (LBI, II*, II, SM, RPG and battlefields), non designated heritage assets, whether of national importance or otherwise and the setting of these assets. The document should consider the direct and indirect impacts of the works both during construction and upon completion.

The direct and indirect impacts should be addressed in line with best practice and in the one chapter i.e. the assessment of impacts on the settings of assets along the route should be contained within the historic environment chapter and not in the LVIA. For setting we would recommend that the assessment consider all assets within the ZTV and that the assessment should identify the potential impact on all those shown to be within a 'bare earth' ZTV. Those discounted should be listed in an appendix with a brief note explaining why they have not been considered further. All other assets should be considered in full unless circumstances dictate otherwise, in which case the reason should be clearly stated.



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Although the ES will form part of an EIA compliant submission and, it is in this case appropriate to consider the DMRB advice, we would strongly recommend that the resultant tables be confined to the appendix and that a clear narrative discussion of each affected asset be included in line with best practice and published guidance (see below). This should consider each asset in full, from description, period and significance to visibility, significance, impact and harm. We would note that in this context significance refers to 'what is important and why', expressed in terms of the Heritage Values described in Conservation Principles (English Heritage 2008), and not, the supposed local or national importance, level of designation or, list entry.

general illustrative photos may be just that, however, any visualisations intended to demonstrate visibility or impact on specific designated heritage assets should be single image of 70-80mm focal length and comply with the requirements of Visualisation Standards for Wind Energy Development (Highland Council 2016). Whilst this guidance is intended for wind energy, experience has shown that it produces the most visually worthwhile visualisations or bases for photomontage.

For direct impacts the assessment should follow the same format, with the EIA/DMRB tables confined to the appendices and each affected asset considered in a narrative description.

There are many assets along the course of the proposed works that will be identified in the assessment, however, the following are worthy of particular consideration.

Carland Cross barrow cemetery (SM102075), including Warrens Barrow (SM1016888). Following consultation it is proposed to re-route the existing A30 alongside the new route in order to allow these currently separated elements of a well preserved barrow cemetery.

The bowl barrows 500m NW of Higher Ennis Farm (SM1017049), and 130m SE of Penglaze. These barrows are very close to the existing A30 and may be directly affected by the new route.

Chyverton Park (RPGII1000512). Originally potentially affected, however, it appears that amendments may have limited the impact on this protected landscape, although potentially at the expense of impacts on:

Nancarrow Farmhouse and attached wall (LBII1136610).

The Four Burrows (SM1016054). A group of four round barrows straddling the existing A30. Whilst we would have hoped for realignment of the existing A30 in order to reconnect this barrow group, the retention of the old A30 as a local route limits the opportunity to do so.

The Three Burrows (SM1016056). A group of three round barrows close to Chyverton Cross, SE of the current roundabout and potentially impacted either directly or indirectly by the proposed new junction.

The following three Grade II Listed Buildings form a visible group to the north of



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chiverton Cross and are highly vulnerable to adverse impacts from the proposed new junction:

Curch of St Peter, St Agnes Carrick (1141481).

vicarage (1328719).

Schoolroom (1141482).

There are in addition a large number of Listed milestones and boundary stone on the route plus Listed Buildings and Scheduled Monuments that are slightly removed from the old or new A3 and those at a greater distance but highly sensitive, such as the Grade I Trerice. All of these will need to be considered in the assessment.

In addition to considering indirect visual impacts it will, because of the nature of the development, be necessary to consider the effects of road noise on the assets identified.

The A30 at this point runs on a ridge and is believed to be a very ancient route, for this reason the route itself should be considered of historical importance and the assessment should consider the route itself.

Finally, the assessment should consider and propose means of mitigation, management and, environmental improvements to those assets and the route itself where appropriate and achievable.

Yours sincerely,



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cc: C Johns CC

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