

SOUTH WEST OFFICE

The Planning Inspectorate
Major Applications and Plans
3D
Temple Quay House
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BS16PN

Direct Dial: 0117 9750671

Our Ref: PL00297372

21 November 2018

Dear Planning Inspectorate

Re: A30 Chiverton Cross to Carland Cross TR010026

Thank you for consulting with us to inform your Initial Assessment of Principal Issues associated with the above scheme as the Examining Authority in this case.

Historic England's response to the published route and the Cultural Heritage chapter of the Environmental Statement is set out below to inform your assessment of issues affecting the historic environment.

In respect of the Cultural Heritage chapter (6), we are pleased to note that, whilst conforming to the requirements of DMRB and EIA regulations, the actual assessments are well presented in an easily accessible format and that each asset is addressed in an inclusive narrative discussion with the results of the DMRB tabular assessment presented throughout at the relevant sections.

Comments on the Content of the Cultural Heritage Chapter (6)

We would make the following comments on the Cultural Heritage chapter. These comments are largely restricted to those aspects of the assessment where we have concerns.

6.4 Study Area. Whilst we are broadly content with the 300m inner study area we are concerned that the outer study area at one kilometre will exclude any potential assets outside that zone that are likely to be highly sensitive to intrusive modern elements within their wider setting. In this context we are concerned that the baseline does not appear to have identified the Grade I listed building of Trerice (NHLE 1328731). If Trerice and other similar assets have been identified and scoped out of the detailed assessment this process should be recorded in the assessment with a supporting



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reason and justification for the fact that no further investigation has been conducted.

Given the largely ridge top route of the current A30 and the proposed new route that sits downslope alternating from north to south, the new route will in our opinion be significantly more visible over a much further extent than the one kilometre study area regardless of which side of the current route it sits. On this basis the definition and extent of the study area will need to be clearly justified on the basis of supporting information from, for example, the Landscape and Visual Impact assessment.

Table 6-1. Listing is a national designation, therefore Grade II Listed Buildings, which are considered to be of special architectural and historic interest, should be assessed alongside the other national designations and their significance not underplayed as regionally important.

6.10.3. Warrens barrow (SM 29681; NHLE 1016888), Higher Ennis barrow cemetery (SM 32903; NHLE 1020758), Carland Cross. Historic England support this proposal, however, there are significant concerns with the current engineered solution (see below, **NHLE 1017050 and NHLE 1016888**).

6.10.7. Milestones. Any assets, including milestones, removed and intended for re-setting should be subject to a detailed works management plan detailing removal, transport storage and reinstatement details with significant dates identified.

6.11.8. WHS. We agree with the overall assessment of the level of impact for the World Heritage Site.

6.11.10 to 6.11.13. Church of Saint Peter (NHLE no. 1141481), Schoolroom immediately east of Church of St Peter (NHLE no. 1141482) and Vicarage (NHLE no. 1328719). As noted at 6.11.11, the church tower is a prominent landmark in views from most directions. Our concerns are that views from the A30 heading west from the general vicinity of the 'four burrows' scheduled monument will be obstructed by the proposed new junction. The significance of these views being that the church tower, the highest structure in the area at the time of construction, was a prominent focal point for the medieval congregation and an identifiable landmark for all.

It is not clear from the assessment whether long term operational impacts have been assessed because the impact described, at 6.11.13, refers only to the impacts arising from the temporary construction and compound.

6.11.25. Four burrows (SM 29602; NHLE no. 1016054). The assessment provided classifies the impact of the new route on the north of the northernmost barrow as permanent Moderate Adverse, it concludes that there will be no change to the remaining barrows in the group. The cumulative assessment is then concluded to be an overall Neutral impact. Historic England does not consider that the cumulative



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assessment takes due regard of the permanent adverse impact on this group of nationally important barrows which should, in the assessment, be considered as a group and the impacts not atomised by assessment of each barrow in isolation.

6.11.72. Warrens barrow (SM 29681; NHLE 1016888). In our opinion the significant issue here is the loss of views to, and from, the barrow to the north and west. Distant views are an essential factor in the location of barrows such that the loss of such visibility will result in loss of significance derived from this aspect of the barrow's setting. This loss of significance must be appropriately appreciated and should not be underestimated, but also considered separately initially from the undoubted gains in enhancement of the barrow's setting to the south that will arise from the removal of this section of the existing A30. Whilst we do not disagree with the assessment that "While the reuniting of Warrens Barrow with the barrow cemetery to the south is a beneficial impact, it is considered that this is outweighed by substantial changes within the setting of the barrow to the west, north and east.", we do, however, advise that the overall impact should be considered Large Adverse impact rather than Moderate.

Historic England does not consider that the cumulative assessment takes due regard of the permanent adverse impact on the overall Carland Cross group of nationally important barrows which should, in the assessment, be considered as a group and the impacts not atomised by assessment of each barrow in isolation.

Comments on the potential impact of the scheme on individual designated heritage assets.

Chiverton Cross area. Historic England remains concerned regarding the impact of the proposed new junction on views of the church of St Peter (NHLE no. 1141481), particularly from the north and east. This significantly reduces the ability to 'read' the historic importance of the church as a landscape feature and we would recommend that close scrutiny be applied to the engineering options for the new junction.

Four burrows (SM 29602; NHLE no. 1016054). Whilst we welcome the reduction in traffic that the new route will bring, we maintain our disappointment that the scheme offers little in the way of enhancement or mitigation to offset the Moderate Adverse impact that the new route will have on the northernmost barrow of this group. Given the downgrading of the current route we would welcome a reduction in the width of the carriageway at this point. This would reduce the visual impact of the current A30 as it passes the monument.

Nancarrow Farmhouse and attached wall LBII (NHLE no. 1136610) and Chyverton Park RPGII (NHLE no. 1000512). We remain unable to comment in detail on the relative historic environment impacts of the proposed route in relation to the above designated heritage assets since the previously requested options appraisal for the route between these designated heritage assets has not as yet been supplied.



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Bowl barrow 130m south east of Penglaze (SM 19680; NHLE no. 1016887). We would note the potential to restrict the width of the existing A30 route as a result of the downgrading and advise that in our opinion this would facilitate significant environmental improvements to the setting of the scheduled monument.

Two bowl barrows 290m and 375m north of Higher Ennis Farm (SM 32902; NHLE no. 1017050). We note the assessment of impact and the engineering requirement for the northernmost of these barrows as a result of the chosen route. However, we would draw to the Examining Authority's attention the fact that the original proposed route, which crossed the existing A30 some way to the west, did not require this work. In our opinion, the selection of the route in this area will need to be clearly justified as it has been demonstrated through the development phase that alternative options, less harmful to the historic environment, may exist.

Warrens barrow (SM 29681; NHLE no. 1016888) and Round barrow cemetery 420m north-east of Higher Ennis Farm (SM 32903; NHLE no. 1020758). We welcome the removal of the existing A30 from between these two separately designated elements of the round barrow cemetery at Carland Cross. This will reinstate the overall connectivity of the cemetery and allow for an improved management regime for Warren's barrow. We would advise that a key deliverable public benefit in heritage terms from this scheme should be the removal of this monument from Historic England's Heritage At Risk register.

Historic England's main concern is that regardless of the issues outlined above, the current proposals for the new route will result in a very high level of harm to the significance of the Warrens barrow scheduled monument that will not, in our opinion, be sufficiently offset by the potential for benefits gained from re-unification of the cemetery. The location of barrows is a significant element of their importance, usually located for maximum impact and visibility in both long and short views, they provide and illustrate the importance of landscape to the life and burial practices of prehistoric peoples. Since, in Historic England's opinion, there remains potential for further discussion to identify alterations to engineering details that would reduce the level of harm caused we would recommend that the Examining Authority encourage the applicant to continue to pursue discussion regarding this element of the scheme with Historic England in the interest of reducing its environmental impact.

We have previously requested a detailed examination of the engineering options for this junction on the basis that relatively minor changes could potentially affect major impacts and reductions in harm in relation to this issue. We would recommend that the Examining Authority urge the applicant to undertake a serious engineering options appraisal regarding the levels at the proposed new Carland Cross junction. In addition we would recommend further consideration of whether there are opportunities to achieve better value for public money and at the same time a reduced environmental impact in heritage terms in the proposals for this junction.



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Potential additional benefits of the scheme.

In addition to the potential for improvement to the settings of the scheduled monuments of four burrows and the barrow 130m south east of Penglaze there is great potential for the scheme to inform through archaeological investigation and subsequent publication. There has been a substantial amount of evaluation work undertaken which, in addition to map and records based investigation could provide a worthwhile accessible publication looking at the history and archaeology of the route. We would encourage consideration of how this might be achieved and tied to delivery of the scheme.

There is in our view great potential for the scheme to deliver improvements to the understanding and interpretation of the Carland Cross barrows if the engineering solution to the junction is revisited. However, at present, we consider that the overall cumulative impact of the impacts discussed above in addition to the major impact the scheme will have on the wider historic landscape of the ridge route between Chiverton Cross and Carland Cross, will result in an overall negative impact. Currently, we do not consider that the substantial benefits in heritage terms are sufficiently balanced against the overall negative impacts in heritage terms. Consequently we would welcome the opportunity to liaise further with the applicant and their consultants in the interest of identifying how an improved balance might be achieved in heritage terms, which would be in the interest of contributing to the overall planning balance and reduction in the environmental impact in heritage terms.

Yours Sincerely



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cc. 
