



Historic England

Our ref: PL00722162

Your ref: HE551511

Direct dial: 020 7973 3700

Date: 2nd December 2020

**Re: M3 JUNCTION 9 IMPROVEMENT ENVIRONMENTAL IMPACT
ASSESSMENT (EIA) SCOPING REPORT**

Thank you for your letter of 23rd October 2020 consulting us about the above EIA Scoping Report.

This development has the potential to have an impact upon a number of designated heritage assets¹. We note that that impact is likely to be primarily to the significance of those assets as contributed to by their setting.

In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

Known Heritage Assets

Our initial assessment shows the attached list of designated heritage assets within a 1 km of the proposed development. We would draw your attention, in particular, to the following which we feel are likely to be most impacted by the proposals. We do however note that this may be subject to change once the details of the designs are released.:

¹ A Designated Heritage Asset is defined in the National Planning Policy Framework as 'A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation'.



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Scheduled Monuments

- The late Iron Age settlement site north of Grace's Farm (HA UID 1001825)
- The Angle Saxon cemetery in Worthy Park (HA UID 1001817)
- The Site of St Gertrude's Chapel (HA UID 1005518)
- Roman Road East of St Catherine's Hill (HA UID 1001798)
- St Catherine's Hill Hillfort (HA UID 1016489)
- The Bowl Barrow at the East of Magdalen Hill Down (HA UID 1015984)
- Round Barrow cemetery on Magdalen Hill Down (HA UID 1016746)

Listed Buildings (Grade I and II*)

- Grade I Church of St Mary (HA UID 1095898)
- Grade II* Worthy Park House (HA UID 1095892)
- Grade II* Church of St Mary (HA UID 1156360)
- Grade II* Dymoke House (HA UID 1095857)
- Grade II* Church of St Swithin (HA UID 1350471)

Conservation Areas

- Abbots Worthy
- Easton
- Kings Worthy
- Martyr Worthy

We would expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest. Undesignated assets can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic



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Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

We would strongly recommend that you involve the Conservation Officer and archaeological staff at Winchester City Council in the development of this assessment. They are best placed to provide advice on the following aspects;

- Local historic environment issues and priorities
- Ways in which the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment
- The nature and design of any required mitigation measures;
- Opportunities for securing wider benefits for the future conservation and management of heritage assets.

Proposed study area

There is the possibility of taller structures being constructed as part of the proposed development. These structures could have an impact on the significance of designated heritage assets as contributed to by their setting, and the surrounding landscape character. Therefore the proposals could, as a result, affect the significance of heritage assets at some distance from this site itself.

We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

Potential impacts

It is important that the assessment is designed to ensure that all impacts are fully understood including the contribution the setting makes to the significance of these assets. In this respect an analysis of the views from within the site, out of, and across the site in relation to designated heritage assets will be important.

Techniques such as photomontages and computer generated views analysis imagery are a useful part of this.



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ZTV studies are also proposed and we think these will be helpful in understanding setting impacts in relation to heritage assets. It will be important to have close collaboration between cultural heritage and landscape/visual impact assessment. Further guidance on setting can be found at our website (<<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>>).

Consideration should also be given to undertaking a practical exercise with either a crane or balloons erected at the height of any proposed tall structures so that all parties are better able to understand the landscape impact of the proposals. We have been engaged in other major developments where this technique has been used and it greatly assisted the identification of the key issues and impacts from which the resulting EIA was able to focus its assessment.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area.

Finally, the assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

Content of the scoping report

We have the following comments to make regarding the content of the Scoping Report:

7.2.1 We note that the existing Desk Based Assessment, which informed the previous scoping report, will be updated. We support this and welcome the greater focus on the impacts of the proposals to designated heritage assets and particularly, consideration of their setting.

We welcome the opportunity to comment on this as and when the document becomes available.

8.1.1 The scope of the ZTV is yet to be determined and further work will inform on the extent of this. It would be our advice that assessments of this nature should be undertaken during the winter months where existing foliage is at a minimum to ensure all possible receptors are included.

This assessment should also take into consideration any structures within the proposals which are of height.



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Given the number of designated heritage assets within the area, we would welcome early discussions with you in order to agree the key sites and setting issues which will need to be addressed within the EIA.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely

Alex Bellisario

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