

1. Introduction

- 1.1. The following information is submitted in response to the Rule 8 and 9 letter (TR010065) dated 15th October 2024 for the A46 Newark Bypass submitted by National Highways for an Order Granting Development Consent. Our comments follow the Council's Local Impact Report (REP1-035), Written Representations (REP2-051) and response to ExQ1 (REP2-050).
- 1.2. The comments made for Deadline 3 are made by Newark and Sherwood District Council in their statutory role as the Local Planning Authority (LPA) and not as landowner.
- 1.3. Having reviewed the information submitted for Deadline 2 (12th November 2024), the Council (as LPA) would wish to comment on submission titled 7.36 Supporting Historic Environment and Visual Impact Assessment (REP2-020). The LPA acknowledges the receipt of information by National Highways at Deadline 2 but does not wish to comment on any matter other than those in this response stated below, which relate to the cumulative effects and the visual impact.

2. Cumulative Effects

- 2.1. Document 7.37 Cumulative Effects Assessment Technical Note (REP2-021) was submitted to the LPA by email on 7th November 2024 by the applicant. In that email it included a list of 6 developments/applications which the applicant was seeking to include in the updated cumulative effects report for the 12th November deadline. Paragraph 1.5.1 of the above Technical Note states that the LPA has not responded to date on the matter. The LPA did respond prior to 12th November to ask the applicant what information they required of the LPA as it was unclear what the premise of the email was seeking. However, the LPA does not have any further information to add to this matter that has not already been raised in previous submissions.

3. Visual Impact

- 3.1. In Chapter 11 of the Local Impact Report (REP1-035) submitted by this Council, we raised the matter of the lack of visual representation at two points on the new route which relates to the heritage impact of the Church of St. Mary Magdalene and Newark Castle as a result of the changes to the Cattle Market roundabout and the heritage impact on the Winthorpe Conservation Area. We therefore requested additional viewpoints which the ExA confirmed were required as a result of their site visit. These viewpoints have now resulted in the submission of the 7.36 Supporting Historic Environment and Visual Impact Assessment (REP2-020). This document includes VP18 (top of Newark Castle), VP25 (Smeaton's Arches), VP24 (Sandhill's Park) and VP43A (Winthorpe). Additional commentary has been provided, at the request of the ExA on VP11 analysing the river users' experience of the River Trent. The LPA does not have any comments to make on this latter viewpoint matter.

Viewpoint 18 – from Newark Castle

- 3.2. The A46 will be visible from the Gatehouse viewing platform, looking north towards British Sugar. The existing view includes a mix of modern buildings alongside notable historic structures, such as the Grade II listed Castle Railway Station (LEN 1228701), the Former Station Master's House at Castle Station (LEN 1228717), and the Goods Warehouse, located 150 metres northeast of Castle House (LEN 1228797).
- 3.3. The road will be approximately the same height as the Castle House building. However, the glimpses of the highly engineered road structure juxtaposed against the brick buildings are likely to appear incongruous. No details or confirmation have been provided regarding lighting along the A46 but it is noted that this is a matter being discussed at ISH4 (item 4) and therefore this can be explored in more detail. However, should lighting be proposed, the height of the lighting columns could also have a potentially negative visual impact. The current low lying A46 is barely noticeable on its existing alignment, save for glimpses to the north through the existing tree line. The heightened infrastructure, coupled with the movement of vehicles along the road is expected to draw further attention to the structure from within the Newark Urban Area.

Viewpoint 24 – Sandhills Park

- 3.4. This viewpoint has been identified by the ExA as requiring a wider 180 degrees viewpoint to encompass more of the impact than was originally represented by the applicant. The photo produced by the applicant does not appear to add anything to the existing representation other than showing an outline of the flyover. It is accepted that the presence of the existing buildings gives an inaccurate representation, however it is still the Council's position as LPA, that the impact upon those existing residents would still be harmful and their amenity detrimentally impacted upon by the presence of the raised infrastructure and especially the flyover.

Viewpoint 25 – southwards along Great North Road

- 3.5. The photomontage doesn't show any light columns on the flyover itself but around the roundabout, it is assumed that lighting will be part of the design, and if they are located on the flyover then these will project even higher. It would be helpful if the applicant could share this lighting scheme or their intentions so we can be more informed of the final design.
- 3.6. The applicant has shown the infrastructure to be flat faced with blank elevations, creating a harsh visual appearance. The current approach to Newark from the north is heavily landscaped on either side of the carriageway with the highway almost seeming secondary to its setting. The spire of Church of St. Mary Magdalene can be viewed from this approach.
- 3.7. As a result of the delivery of the scheme, it would see a landscape which is heavily cleared of its 'green' credentials, to a landscape which is dominated by built

infrastructure. These factors, design and lack of sufficient soft landscaping, would result in the proposal having a significant impact on the historic gateway to Newark.

3.8. The proposed flyover would create a physical barrier, separating three of the Smeaton's arches/causeway designations from the other eight located along Great North Road as well as cutting off any views to Newark from this approach and the spire. Therefore, we considered that there would be harm from both directions on the approach to the Cattle Market roundabout.

3.9. Due to the alignment of Great North Road, views of the flyover would be experienced from the River Trent and the foot of Newark Castle. This is a heavily used pedestrian route as well as vehicular route, in to and around Newark due to its connections to Newark Castle train station, Riverside Park and obviously the Newark Castle and other heritage assets. The ES Figure 2.3 Environmental Masterplan sheet 3 (AS-026) and the viewpoint at year 15, show that the view of the flyover will be screened with planting, however this is considered to have minimal effect.

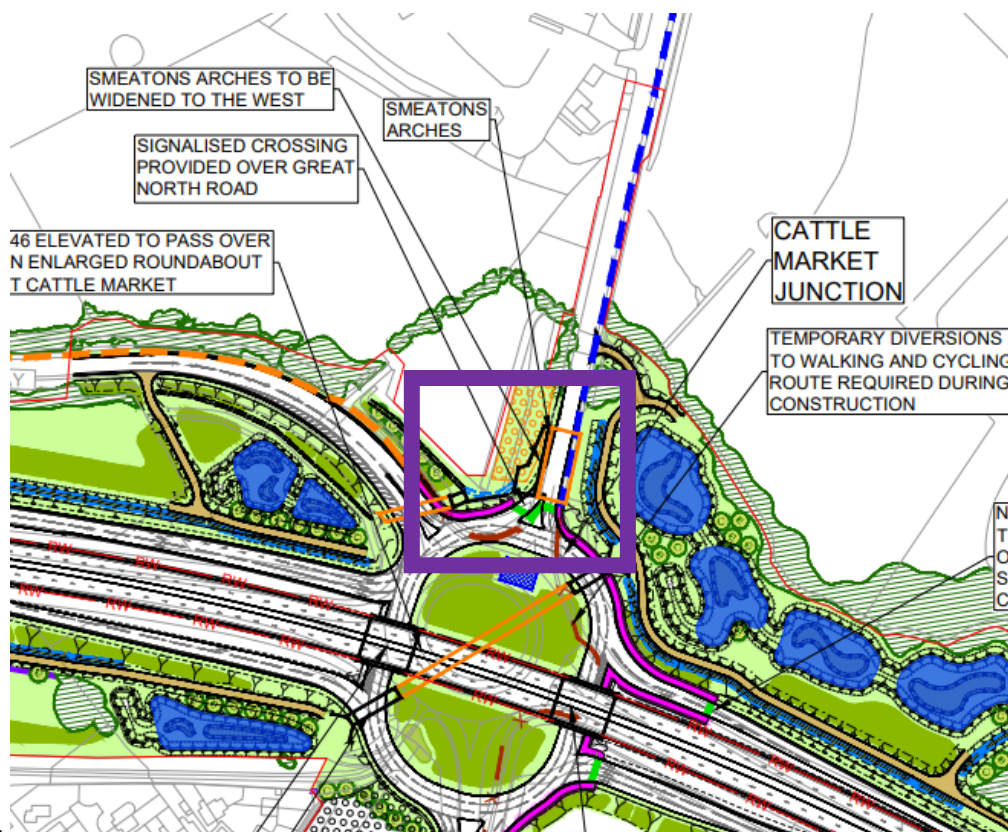
3.10. It is not clear if other design approaches have been considered and why this design has been deemed the most suitable for this location, given its sensitivity. It may be that it has been more engineering led as opposed to location, and that screening through landscaping had been considered sufficient mitigation by the applicant.

3.11. Many of our concerns could be addressed through a change in design approach, such as having a more open design by removing the central section (see below). This would allow views along Great North Road, creating a structure that is less of a harsh physical barrier.



3.12.

3.13. We also wish to bring to the ExA's attention on the accuracy of the photomontage. The photo shows a straight alignment to Smeaton's Arches whereas the General Arrangement drawing Sheet 3 (AS-007) (see extract below) and from discussions with the applicant on the works to Smeaton's Arches and the mitigation proposed, it was agreed that due to the swept path of the roundabout, the arches (above ground) would be on a curved alignment on the approach to the roundabout. This mitigation was discussed in the Council's LIR (REP1-035) and had been taken on board as a proactive approach to the scheme.



3.14.

3.15. Upon further assessment of the viewpoints at 18 and 25 and the severity of the impact that we expect the flyover to have, especially now that we have seen the visual from the north, it would be beneficial in our assessment of visual harm, to have a visual from the ground level of the Great North Road looking towards the flyover. It is suspected that even given the limited visual screening on the roundabout, that it would still be highly visual even at the 15 year mark so we need to be confident that any mitigation would be acceptable and the impact upon Newark is reasonable. The suggestion is, and is subject to agreement by the ExA, that the image could be taken from between Newark Castle train station and the ASI/Council offices junction.

3.16. Finally, within the document 7.36 Supporting Historic Environment and Visual Impact Assessment (REP2-020) para 1.3.2, it states *“in order to ensure the photomontage is representative of the view experienced from Great North Road at Smeaton’s Arches, as per the Rule 6 request, the new photograph has been taken further south of VP 25 as denoted in Appendix B of this report.”* From reviewing the photo and the siting of VP25 on the Visual Effects Plan (AS-041) they appear to be in similar locations. The LPA would be interested to understand, by way of a new plotting on the Visual Effects Plan, where this was taken from, as from the photo would appear to be taken from Smeaton’s Arches. Any further south (towards Newark and the Cattle Market roundabout) and the photo would not show the arches.

Viewpoint 43A – South front PRoW Winthorpe FP2

3.17. The new location still makes it very difficult to view the A1 flyover in relation to the Winthorpe Conservation Area, however we have viewed this viewpoint in conjunction

with VP41, which also shows a glimpse of the A1 flyover. This A1 flyover is much greener than the proposed Cattle Market flyover and is a stark contrast in comparison. The green landscaping does, in this case, help to mitigate against the introduction of the development proposal. Views from the PRoW after 1 year show that the most prominent element is the fencing. By the 15 year photomontage, vegetation screening is the most prominent. From this depiction, it is likely that the approaches to the flyover will have softened into the landscape sufficiently in our opinion.

4. Conclusion

- 4.1. In conclusion, whilst we can only again reiterate our continued support for the scheme, as we have done in all of our submissions, we still have some concerns. Whilst we are generally more accepting of the relationship with the Winthorpe Conservation Area from a heritage perspective, the harm identified by the visual representation at VP25 only seeks to reaffirm the Council's concern over the heritage impact. The views from the Castle (VP18) do also allow views of the raised infrastructure which would only appear incongruous in the landscape, although it is already varied, the structure would be heightened by the loss of landscaping and the raised vehicles using it. The visuals show limited representation as they are caveated as not including mitigation planting. However, when there is a loss of trees in this scale, the photos are only really beneficial to show position in the landscape in terms of scale.
- 4.2. The Council only had one visual of the Cattle Market flyover which, now we have seen the extent of it from Smeaton's Arches, the impact from Great North Road towards the roundabout is even more key and we ask that this representation is made at the discretion of the ExA.