highways england

A303 Stonehenge

Amesbury to Berwick Down

Report on Public Consultation

Appendix B

Volume 3

September 2017

Responses from:

Amesbury Town Council
Avebury Parish Council
Chitterne Parish Council
Cranborne Chase Area of Outstanding Natural Beauty
Durnford Parish Council
Durrington Town Council
Environment Agency
Historic England
Laverstock and Ford Parish Council
Ministry of Defence (MOD)
Natural England
North Wessex Downs Area of Outstanding Natural Beauty
Shrewton Parish Council
The Parish of Berwick St James
Tisbury Parish Council
Wiltshire Council
Wiltshire Police
Winterbourne Stoke Parish Council
Woodford Parish Council

Amesbury Town Council

From: Wendy Bown <amesburyclerk@btconnect.com>
Sent: 10 February 2017 14:44
To: A303Stonehenge
Cc: 'Trader'; yourvalleynews@aol.com; 'Adam Pilon'
Subject: Consultation A303 Stonehenge: Amesbury to Berwick Down

Please accept this as a contribution to the consultation:

Statement from Amesbury Town Council on the Consultation: A303 Stonehenge Amesbury to Berwick Down

At the Town Council meeting on 7th February 2017 a split vote – 8 votes to 7 – accepted the statement below:

Amesbury Town Council considered the details of the consultation: A303 Stonehenge Amesbury to Berwick Down and strongly agrees to the solution of dualling the A303, including a bypass at Winterbourne Stoke and improvements to the existing junctions between the A303 and the intersecting A345 and A360.
With consideration to Amesbury as a hub for surrounding villages, its residents, businesses and visitors, and with consideration of its heritage, the Town Council would state that:
Serious consideration must be given to maintaining a full junction capacity at Countess Roundabout. There must be access onto and off the A303 at the roundabout, to enable traffic to continue to access and leave the town. The Town Council agrees the importance of retaining the Solstice Park junction, and it should not be altered. The Town Council has also concluded that the lack of a full A345/A303 junction capacity at Countess Roundabout would have a negative impact on the residential areas of London Road, Porton Road and Countess Road.
The Town Council requests further investigation into the mitigation of noise distribution from the possible flyover (with a possibility of lowering or tunnelling) and insists that attention be paid to the preservation of the historic sites of Blick Mead and Vespasians Camp, and Grade 2 listed buildings and businesses at Countess Roundabout, particularly when calculating the land required for the creation of slip roads.

Many thanks.

Best wishes

Wendy Bown
Town Clerk
Amesbury Town Council

Avebury Parish Council

Avebury Parish Council

6 Rhyls Cottages, Lockeridge, Marlborough, Wilts SN8 4EE
Tel 01672 861424

FREEPOST

A303 STONEHENGE CONSULTATION

1 March 2017

Dear Sir or Madam

Response to A303 consultation: Amesbury to Berwick Down

Please find attached the Parish Council's response to the current consultation on the A303 road scheme at Stonehenge. Avebury Parish is in the other half of the Stonehenge and Avebury World Heritage Site and the Council is concerned about impacts of the A303 scheme here and has positive proposals to make.

Yours faithfully

Andrew Williamson OBE
Chairman

cc: Dr Anatole-Gabriel, UNESCO
Mr Chris Grayling (Secretary of State for Transport)
Mr John Hayes (Minister for Transport)
Ms Susan Denyer (Secretary, ICOMOS-UK)
Mr Alistair Sommerlad (Chair, WHS Partnership Panel)
Ms Sarah Simmonds (WHS Partnership Manager)

Avebury Parish Council

Response to consultation on proposed A303 Expressway between Amesbury and Berwick Down.

Avebury Parish Council is grateful to Highways England for attending its meeting on 7 February 2017 to give a presentation on the proposed A303 Expressway scheme. The Parish Council wishes to respond to the consultation, and to propose that an alternative scheme is explored.

Avebury Parish lies entirely within the Avebury half of the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS). The Parish Council represents the interests of local residents, employers and employees. The Council is also very aware of the importance of the WHS nationally and internationally to the 250,000 to 300,000 visitors, archaeologists, school children, faith groups, artists and many others who come to the Avebury half of the WHS each year.

The integrity of the WHS is fundamental to the economic, social and cultural life of the community. It is very important internationally and is also a significant component of the economic and cultural life of Wiltshire and the nation.

The Parish Council notes many of the positive and negative impacts of the proposed Expressway for the Stonehenge area.

The Parish Council has endorsed the WHS Management Plan 2015 and is concerned that the primary aim of **protecting** the Site is observed, as set out in the Plan's introduction. The Plan states that 'It is essential that all change is carefully planned and that competing uses are reconciled without compromising the overriding commitment to **protect** the Site and maintain its OUV' (para 1.1.7).

Damage caused by the proposed A303 scheme could however result in negative impacts on the Avebury half of the WHS if:

1. UNESCO were to delist the WHS, or add it to its List of World Heritage Sites in Danger
2. a precedent is set whereby further damaging schemes in future could be built in either half of the WHS.

More specifically, the Parish Council is concerned that:

1. the construction of portals at each end of the proposed tunnel together with about 1.5km of dual carriageway at surface level in the western part of the Site at Stonehenge will adversely affect a number of archaeological features and their settings. Highways England's Technical Appraisal Report states at paragraph 18.3.39 that 'Options D061 and D062 would result in a range of slight to very large adverse impacts on more than 60 scheduled monuments'.
2. the western portal together with roads and junctions inside and outside the WHS will:
    a. impact on the settings of monuments
    b. interfere with interrelationships between monuments
    c. damage or compromise more specific features, including winter solstice alignments and the unique long barrow group above the dry valley system close to the proposed western portal.

3. the Technical Appraisal Report does not include a chapter on archaeological assessment. While it includes chapters on economic, social, and other assessments, it only briefly mentions the historic environment in Chapter 18. Archaeology is fundamental to preserving WHS status and the Parish Council is very concerned at the omission of a specific chapter on the subject.

The Parish Council urges that:

1. monuments, their settings and interrelationships including astronomical alignments be protected and adverse impacts on them be much reduced
2. all ICOMOS / UNESCO recommendations be included in the final design so that ICOMOS / UNESCO agreement is obtained
3. Route Option F010 is built instead of a tunnel option.

The Parish Council is aware that some monuments in the WHS are 4,500 years old and believes that a test should be applied – that it should be likely that the scheme should still be seen to be an acceptable intervention in 4,500 years' time.

An alternative scheme

We understand that Highways England has not explored an alternative, asymmetric, scheme that would avoid creating the proposed dual carriageway of about 1.5km, and twin portals, in the western part of the Site. But all the archaeology on the line of the proposed surface level dual carriageway would remain protected and intact, and all the costs of building this section of dual carriageway would be saved, if:

1. about 1.5km, or more, of the existing A303 running eastwards from the western boundary of the WHS was reused/recycled by converting it from a single lane highway in each direction to a one-direction pair of lanes (for say eastbound traffic) that then entered a single portal for a tunnel of 2.9km, or less, that emerged just east of The Avenue
2. a 4.5km tunnel (for say westbound traffic) was bored from just east of The Avenue to emerge at a single portal just to the west of the WHS
3. human ingenuity and experience overseas was applied to solving issues of ventilation, safety, deliverability etc.

The cost of boring a single, longer tunnel might be higher, but would be largely or totally offset by a combination of:

1. a 100% saving in the cost of constructing a new, 1.5km surface-level dual carriageway
2. any savings from building a shorter (eastbound) tunnel of less than 2.9km
3. a much reduced extra-over cost of boring a longer 4.5km tunnel, given that tunnelling equipment would already be commissioned and on site
4. raising private or philanthropic money to meet some extra costs, given the strength of the WHS brand.

This alternative scheme could help to protect the archaeology of the Site, meet ICOMOS and UNESCO's requirements and ensure the acceptability of the scheme in 4,500 years' time.

1 March 2017

Response ID ANON-BABJ-X6PM-T

Submitted to **A303 Stonehenge**
Submitted on **2017-03-01 12:00:26**

Introduction

Name

Name:
Andrew Williamson

Postcode

Postcode:
SN8 1RF

Email

Email address:
andrewwilliamson1000@gmail.com

Postal address

Address:
Ashdown, High Street, Avebury, Wilts SN8 1RF

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Avebury Parish Council

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
Please see Avebury Parish Council's letter and response paper dated and posted 1 March 2017.

For the avoidance of doubt, the Parish Council's response is:

Avebury Parish Council
Response to consultation on proposed A303 Expressway between Amesbury and Berwick Down.
Avebury Parish Council is grateful to Highways England for attending its meeting on 7 February 2017 to give a presentation on the proposed A303 Expressway scheme. The Parish Council wishes to respond to the consultation, and to propose that an alternative scheme is explored.
Avebury Parish lies entirely within the Avebury half of the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS). The Parish Council represents the interests of local residents, employers and employees. The Council is also very aware of the importance of the WHS nationally and internationally to the 250,000 to 300,000 visitors, archaeologists, school children, faith groups, artists and many others who come to the Avebury half of the WHS each year.
The integrity of the WHS is fundamental to the economic, social and cultural life of the community. It is very important internationally and is also a significant component of the economic and cultural life of Wiltshire and the nation.
The Parish Council notes many of the positive and negative impacts of the proposed Expressway for the Stonehenge area.
The Parish Council has endorsed the WHS Management Plan 2015 and is concerned that the primary aim of protecting the Site is observed, as set out in the Plan's introduction. The Plan states that 'It is essential that all change is carefully planned and that competing uses are reconciled without compromising the overriding commitment to protect the Site and maintain its OUV' (para 1.1.7).
Damage caused by the proposed A303 scheme could however result in negative impacts on the Avebury half of the WHS if:
1. UNESCO were to delist the WHS, or add it to its List of World Heritage Sites in Danger
2. a precedent is set whereby further damaging schemes in future could be built in either half of the WHS.
More specifically, the Parish Council is concerned that:
1. the construction of portals at each end of the proposed tunnel together with about 1.5km of dual carriageway at surface level in the western part of the Site at Stonehenge will adversely affect a number of archaeological features and their settings. Highways England's Technical Appraisal Report states at paragraph 18.3.39 that 'Options D061 and D062 would result in a range of slight to very large adverse impacts on more than 60 scheduled monuments'.
2. the western portal together with roads and junctions inside and outside the WHS will:
a. impact on the settings of monuments
b. interfere with interrelationships between monuments
c. damage or compromise more specific features, including winter solstice alignments and the unique long barrow group above the dry valley system close to the

proposed western portal.
3. the Technical Appraisal Report does not include a chapter on archaeological assessment. While it includes chapters on economic, social, and other assessments, it only briefly mentions the historic environment in Chapter 18. Archaeology is fundamental to preserving WHS status and the Parish Council is very concerned at the omission of a specific chapter on the subject.
The Parish Council urges that:
1. monuments, their settings and interrelationships including astronomical alignments be protected and adverse impacts on them be much reduced
2. all ICOMOS / UNESCO recommendations be included in the final design so that ICOMOS / UNESCO agreement is obtained
3. Route Option F010 is built instead of a tunnel option.
The Parish Council is aware that some monuments in the WHS are 4,500 years old and believes that a test should be applied – that it should be likely that the scheme should still be seen to be an acceptable intervention in 4,500 years' time.
An alternative scheme
We understand that Highways England has not explored an alternative, asymmetric, scheme that would avoid creating the proposed dual carriageway of about 1.5km, and twin portals, in the western part of the Site. But all the archaeology on the line of the proposed surface level dual carriageway would remain protected and intact, and all the costs of building this section of dual carriageway would be saved, if:
1. about 1.5km, or more, of the existing A303 running eastwards from the western boundary of the WHS was reused/recycled by converting it from a single lane highway in each direction to a one-direction pair of lanes (for say eastbound traffic) that then entered a single portal for a tunnel of 2.9km, or less, that emerged just east of The Avenue
2. a 4.5km tunnel (for say westbound traffic) was bored from just east of The Avenue to emerge at a single portal just to the west of the WHS
3. human ingenuity and experience overseas was applied to solving issues of ventilation, safety, deliverability etc.
The cost of boring a single, longer tunnel might be higher, but would be largely or totally offset by a combination of:
1. a 100% saving in the cost of constructing a new, 1.5km surface-level dual carriageway
2. any savings from building a shorter (eastbound) tunnel of less than 2.9km
3. a much reduced extra-over cost of boring a longer 4.5km tunnel, given that tunnelling equipment would already be commissioned and on site
4. raising private or philanthropic money to meet some extra costs, given the strength of the WHS brand.
This alternative scheme could help to protect the archaeology of the Site, meet ICOMOS and UNESCO's requirements and ensure the acceptability of the scheme in 4,500 years' time.

1 March 2017

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Don't know

Please provide any comments to support your answer for question 2:
Insufficient archaeological information has been provided for the Parish Council to form an opinion. Please see Avebury Parish Council's letter and response paper dated 1 March 2017.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
Please see Avebury Parish Council's letter and response paper dated 1 March 2017.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Not Answered

Please provide any comments to support your answer for Question 4:
Please see Avebury Parish Council's letter and response paper dated 1 March 2017.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Please see Avebury Parish Council's letter and response paper dated 1 March 2017.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Please see Avebury Parish Council's letter and response paper dated 1 March 2017.

7. Do you have any other comments?

Q7:
Please see Avebury Parish Council's letter and response paper dated 1 March 2017.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Not Answered

Other source:
Parish Council in World Heritage Site

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Please see Avebury Parish Council's letter and response paper dated 1 March 2017.
1. Information provided was poor. An archaeological assessment is essential in a World Heritage Site inscribed by UNESCO for its archaeological importance, but no such chapter was included in the Technical Appraisal Report
2. No public information event was planned in Avebury or in the north of Wiltshire. The Parish Council had to request a presentation
3. The format of the consultation and feedback form was poor. The few issues presented and the questions posed for response were focussed on how two options should be implemented, and not wider considerations, including whether other options would be more appropriate in protecting the World Heritage Site in accordance with the WHS Management Plan 2015. Reponses on Route F010 were not invited, and Highways England had not explored other options such as recycling/reusing part of the existing A303 to avoid damaging or compromising monuments and the Outstanding Universal Value of the WHS.
4. There was no assessment of the very long term implications of the scheme over centuries and millennia.
5. The Equality and Diversity section does not have a category for organisations and cannot therefore be answered.

Chitterne Parish Council

Response ID ANON-BABJ-X6BB-1

Submitted to **A303 Stonehenge**
Submitted on **2017-02-21 14:45:02**

Introduction

Name

Name:
Virginia Neal

Postcode

Postcode:
BA12 0LL

Email

Email address:
chitternepcclerk@btinternet.com

Postal address

Address:
Chitterne Parish Council
c/o Clump House
Chitterne
Wiltshire
BA12 0LL

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Chitterne Parish Council

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
An upgrading of the A303 at Stonehenge is essential to reduce rat running through local villages such as Chitterne.
It will be very important to ensure that the junctions are well designed and carefully thought through, especially on and off the A360.
A detailed, well thought out traffic management plan for the area will be essential to ensure that the majority of tourist bus traffic entering and exiting The Stonehenge Visitor Centre is organised to enter and exit south via the A360 and A303. This will reduce the high number of tourist buses using the unsuitable (narrow with no footpaths in places) B390 though Chitterne.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:
It would be preferable to have the eastern tunnel entrance nearer to Countess Roundabout keep it further away from The Avenue.

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:
It would be preferable for the western exit from the tunnel to be located to the west of the A360 for Option 1N as this would have preserved the integrity of the WHS.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
The northern route for the Winterbourne Stoke bypass is the most suitable option. The Northern route cuts across farmland and does not impinge on any villages/housing, unlike the southern route which passes very close to housing at the southern end of Winterbourne Stoke and the group of houses north of Berwick St James.

The northern route affects very few residences and passes far enough away from the Parsonage Down nature reserve not to have any major detrimental effect.

Disagree that the southern route would not have adverse impacts on the setting of the conservation areas and listed buildings in Winterbourne Stoke and Berwick St James.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
There must be a flyover to encourage the smooth running of the majority of traffic.

Signage must be VERY clear that access to Stonehenge Visitor Centre must be via the A303/A360 to avoid people coming off the A303 at Countess Roundabout and heading north via Larkhill to access Stonehenge.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Chitterne village suffers badly from high numbers of tourist buses accessing the Stonehenge Visitor Centre via the B390, which is unsuitable for large vehicles.

When the junction is designed there must be joined up thinking with the Stonehenge Visitor Centre to ensure that tourist buses are made to access and exit the site only via the A303. This could be achieved easily with some reconfiguring of the roundabout at Airman's Cross and clear signage for bus drivers.

The correct design of the junction from A303 onto the A360 will be very important to allow flow of tourist traffic onto and off the A303. Realistic assessments of the number of vehicles that visit Stonehenge must be used to avoid the under estimating of the number of visitors as happened during the design phase of the Visitor centre and Car Park.

7. Do you have any other comments?

Q7:
Chitterne Parish Council would be very happy to participate in any discussions about the upgrading of the A303 to ensure that the effect of the traffic - in particular tourist buses accessing Stonehenge - on the local area is properly discussed and appropriate solutions identified to ameliorate the situation.
The upgrading of the A303 at Stonehenge is an opportunity to address these negative issues which badly affect the residents of Chitterne.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Word-of-mouth

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Cranborne Chase Area of Outstanding Natural Beauty

Response ID ANON-BABJ-XGTY-U

Submitted to **A303 Stonehenge**
Submitted on **2017-02-06 14:15:32**

Introduction

Name

Name:
Richard Burden FLI PPLI

Postcode

Postcode:
BH21 1HB

Email

Email address:
richardburden@cranbornechase.org.uk

Postal address

Address:
AONB Office
Shears Building
Stone Lane Industrial Estate
Wimborne

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Cranborne Chase Area of Outstanding Natural Beauty

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
This AONB recognises the long existing problems with the A303 at Stonehenge and senses that a tunnel solution is likely to be the most effective. Nevertheless, integrating the final route into the open and sensitive landscapes of the locality is going to be a major challenge as well as being a key element by which the success of the scheme will be judged by current and future generations.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:
This AONB does not have a strong view on the precise location of the portal. It does, however, advise that integrating the portal with the local landscape character in this sensitive location is vital. That is more important than seeking a striking, novel, or futuristic design.

3. To what extent do you agree with our proposed locationof the western portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 3:
This AONB does not have a strong view on the precise location of the portal. It does, however, advise that integrating the portal with the local landscape character in this sensitive location is vital. That is more important than seeking a striking, novel, or futuristic design.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
The prevailing wind is from the south-west so there is the probability that noise will carry into the village from the southern route, even though it is noted that the southern route appears to be farther from the village than the north route. With either option, it is vital that the route is fully and carefully integrated into the local landscape.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Clearly the scheme will not succeed unless east-west and north-south traffic flows improve substantially. Nevertheless, impacts on the physical, visual, and aesthetic landscape are major issues. These should, of course, be avoided, and where that is not possible maximum mitigation should be achieved. If that is not possible then compensation should be provided.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Clearly the scheme will not succeed unless east-west and north-south traffic flows improve substantially. Nevertheless, impacts on the physical, visual, and aesthetic landscape are major issues. These should, of course, be avoided, and where that is not possible maximum mitigation should be achieved. If that is not possible then compensation should be provided.

7. Do you have any other comments?

Q7:
The success of the landscape integration of the final scheme in this sensitive situation will serve as a marker for the standards of the schemes to be implemented later in the highly sensitive landscapes of this nationally important AONB.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
The consultation documents give little attention to the appearance of the proposed options. Whilst there is confidence that highway schemes will achieve highway objectives there is little to give confidence that they will integrate successfully with the local landscapes and that landscape and visual matters will be dealt with satisfactorily.

Durnford Parish Council

Response ID ANON-BABJ-X6PG-M

Submitted to **A303 Stonehenge**
Submitted on **2017-02-28 16:00:21**

Introduction

Name

Name:
Rob Foster

Postcode

Postcode:
SP46AW

Email

Email address:
robfoster12@hotmail.com

Postal address

Address:
Avonbank
Netton
Salisbury
Wiltshire
SP46AW

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Durnford Parish Council

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
The A303 is badly overloaded with traffic throughout the day not just at peak times. This causes rat-running all around the local area not least along the Woodford Valley. As the east side of the valley is also a busy National Cycle Trail there is a potential for conflict between cars and cyclists. It is to be hoped that the proposal will reduce both the rat-running and prove beneficial to local businesses.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:
The actual siting of the Eastern Portal is relatively academic as there is seemingly less scope for variation. However, the closure of the slip road (C42) from West Amesbury onto the A303 will reduce the attractiveness of the Woodford Valley and Amesbury as rat-runs which is a benefit to the area.

3. To what extent do you agree with our proposed locationof the western portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 3:
The western portal is more contentious as it intrudes into the Heritage Area with resultant damage to the archaeology, cultural heritage and landscape therein. Whilst accepting that there is no detail planning contained within the current proposals we believe that there is scope for development of the plan to meet the various concerns that have been raised with regard to this and other issues of which more in our response to Que. 4 below. Whilst it is also accepted that The National Trust and English Heritage will have some oversight of the design it is to be hoped that there is also an independent element to that process.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
Option 1N causes less disruption to WInterbourne Stoke and Berwick St James. The latter village would suffer considerably should the bypass follow the southern route. However, the current proposal for this route shows the junction for the A303/A360 on the existing A303 just to the east of Winterbourne Stoke. This is a longer route for those heading north south and those wishing to use the A303 Eastbound and does not take into account the considerable amount of traffic moving north/south along the A360 to and from Salisbury and the various new developments along its length. A far better solution would be to place the junction in the vicinity of the current intersection at Long Barrow Roundabout. If the proposed junction is built there will be a reduction in vehicle miles/travel time and therefore no incentive for drivers to use the various rat runs along the Woodford Valley , Shrewton, Larkhill etc. to join the A303 at Amesbury or Solstice Park.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
We consider it would be better for the A345 to pass above the A303 rather than the reverse as proposed as this would involve a reduction in the size of the required viaduct. However , it is accepted that there may be insufficient land available for a north/south crossover. Either solution will have an effect on the adjacent properties.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Please see our response to Que. 4 above. Irrespective of which option is chosen for Winterbourne Stoke the A303/A360 junction needs to be closer to the existing one at Longbarrow. In addition the scale of the junction will need to be carefully controlled to prevent excessive intrusion into the Heritage Site AND adjacent landscape.

7. Do you have any other comments?

Q7:
Route F10 as a southern surface alternative to the tunnel option has, seemingly, been discarded on a number of grounds. We agree that this route is unacceptable not least because of the environmental and social damage that will be incurred across a wide swathe of the countryside. We welcome and support this apparent rejection of F10 and would actively oppose any effort to reintroduce either it or any similar alternative scheme.

We would hope that during the construction process measures will be put in place to protect the River Avon and to deter rat running along local routes.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
No

Response ID ANON-BABJ-X3WJ-U

Submitted to **A303 Stonehenge**
Submitted on **2017-03-05 15:01:51**

Introduction

Name

Name:
Vanessa Hawkings

Postcode

Postcode:
SP4 6AZ

Email

Email address:
vanessa.hawkings@zen.co.uk

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Durnford Parish Council

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
I recognise that the A303 has to become a dual carriageway along its entire route. The tunnel option is a good solution to reducing the disruption to the landscape that the road brings.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:
Whilst tending to agree with the position of the Eastern Portal - it is perplexing that the tunnel does not run along the current route of the A303. It has been confirmed that this area has the least amount of archaeology as opposed to the proposed site for the tunnel, where there are issues of sight lines from car lights in terms of alignment with the stones.

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:
All the above.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
Option 1 is by far the better proposal. Decimation to Berwick St James cannot be considered.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
The A303 must be allowed to pass over the Countess Roundabout via a flyover. The current roundabout and the jams it creates is untenable.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
The current design for this junction has not been thought through as traffic going east or west cannot easily join the proposed A303.

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Local authority

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Durrington Town Council

From: Sarah Tucker <clerk@durringtontowncouncil.gov.uk>
Sent: 01 March 2017 14:39
To: A303Stonehenge
Subject: 20170301_DURRINGTON TOWN COUNCIL STATEMENT REFERENCE THE A303 PUBLIC CONSULTATION

Good afternoon,

I was recently provided this email address for the Town Council to submit its statement in relation to the A303 consultation, I hope this is still the case, if not, please could you redirect me, thank you.

Following the public consultations held in the Durrington/Amesbury area, councillors from Durrington Town Council provided their feedback/comments and the following statement is a combination of those comments. This statement was approved at the Town Council meeting last night (28th February 2017).

Durrington Town Council has considered its views following the A303 Public Consultation and believes that the A303 does require dualling from Amesbury to improve transport links to the South West and prevent the bottle necking in the Amesbury/Winterbourne Stoke area. It is not however convinced that a tunnel is the right option and feels that a dual carriageway would be suitable, sustainable and a lower cost option to re-consider.
The Council feels that the public consultation has not dealt with a number of issues that concern Durrington and Larkhill residents and seeks further information about future plans for the junction at Solstice Services and the Countess Roundabout. Councillors believe that both of these accesses/exits of the A303 should remain to enable local traffic access to these villages and the A303. Closing one in favour of another would have a detrimental impact on the local villages, potentially adding to congestion, compounding weak road surfaces and increasing rat running, something the scheme is clear to prevent. Signage for Stonehenge and the wider WHS also needs to remain away from these junctions and be kept to the main access in the vicinity of where the new Longbarrow roundabouts will be sited (A360), as is the current case.
There are also concerns as to the design of a potential flyover at Countess Roundabout, such a scheme would have a negative visual impact on the surrounding residential areas and the associated noise could be heard for miles. The council therefore urges Highways England to carefully consider how Countess Roundabout will link onto the new A303 and suggests considering using the subway that is already in place as an alternative to a flyover.

Kind Regards

Sarah Tucker

Clerk to the Council|Durrington Town Council, Town Council Office, Village Hall, High Street, Durrington, Wiltshire, SP4 8AD|Tel: 01980 654772|Email: clerk@DurringtonTownCouncil.gov.uk
www.durringtontowncouncil.gov.uk

Environment Agency

From: Burt, Katherine <katherine.burt@environment-agency.gov.uk>
Sent: 02 March 2017 15:35
To: A303Stonehenge
Cc: Swan, Lucy
Subject: A303 (Amesbury to Berwick Down) public consultation - Environment Agency response
Attachments: dps1.rtf

Categories: Ask technical team

Please find attached the Environment Agency response to the A303 (Amesbury to Berwick Down) public consultation.

Please contact me if you have any queries.

Regards

Kath

Katherine Burt
Sustainable Places - Planning Specialist
Wessex Area, Environment Agency

✉ Rivers House, Sunrise Business Park, Higher Shaftesbury Road, Blandford Forum, Dorset DT11 8ST
✉ Email: katherine.burt@environment-agency.gov.uk
☎ External: 020302 59339. Internal: 59339. Mobile: 07810 052991.

Please note my landline phone number has changed

The Environment Agency has an email file transfer limit of 8MB. If you wish to send large files to my team please reply to our swx.sp@environment-agency.gov.uk in –box and request a Sharefile link to be emailed to you. With this you can upload files of larger sizes to us.

Mr Andrew Alcorn
Project Manager for A303 Stonehenge
Highways England
Temple Quay House (2) The Square
Bristol
Avon
BS1 6HA

Our ref: WX/2017/130140/01-L01
PAC/WESSEX/00126
Your ref: Public Consultation Jan 2017

Date: 2 March 2017

Dear Mr Alcorn

A303 (AMESBURY TO BERWICK DOWN) PUBLIC CONSULTATION – JANUARY 2017

Thank you for consulting the Environment Agency on the A303 (Amesbury to Berwick Down) Public Consultation. Our comments to each of the questions are provided below, along with some other points we wish to raise.

1) To what extent do you agree with our proposed option?

	Strongly agree
	Tend to agree
X	Neither agree or disagree
	Tend to disagree
	Strongly disagree
	Don't know

Please provide any comments to support your answer for Question 1

The scheme is situated in an area that is sensitive from a groundwater point of view due to the designation of the underlying chalk as a Principal Aquifer and the occurrence of a shallow water table across parts of the proposed route at certain times of the year.

This groundwater provides important baseflow to the River Avon and potentially the river Till (both designated as SSSI and SAC) and also abstractions for public, private and agricultural supplies. It is therefore vulnerable to pollution and changes to flow pathways and interactions with surface waters caused by the proposed tunnel. If not managed this could have a detrimental impact on the water environment.

Water Quality
Impacts on water quality could be caused by, amongst other things:

- pollution incidents (eg. leaks and spills) during construction and operation of the upgraded road

Cont/d..

- discharge of surface run-off from the new road
- mobilisation of pollutants by disturbance of contaminated ground (we note that previous ground investigations have identified contaminated ground at Countess and Longbarrow roundabouts)
- import of contaminated materials for use in construction
- reduction in the thickness and therefore attenuating properties of the unsaturated zone through ground level lowering.

Water Quantity
The most likely potential impacts are changes to groundwater flow patterns which may subsequently alter the spatial and temporal extent and volume of flow in the River Till and River Avon. Measures should be put in place to ensure the construction and operation of the road does not have a detrimental impact on surface and groundwaters and associated flora and fauna.

The greatest risk appears to be the proposed tunnelled section. This is located beneath the Stonehenge Bottom dry valley which is believed to provide a preferential pathway for regional groundwater flow from north to south towards the River Avon. The situation of the tunnel in this area has the potential to disrupt flow patterns and will therefore require comprehensive hydrogeological risk assessment to ensure any impacts are understood and appropriate mitigation is agreed and implemented to prevent negative impact on the water environment. The risk assessment and mitigation should consider both the construction (including any de-watering that may be required to facilitate tunnelling) and operational phases of the scheme.

The creation of cuttings and embankments along the proposed route away from the tunnelled section also has the potential to impact the hydrological and hydrogeological regime and therefore should also be risk assessed accordingly.

The River Till is a winterbourne stream in the area of the proposed road crossings for both route options around Winterbourne Stoke and as such has complex interactions with groundwater. We would not wish to see any significant disturbance of the river bed during construction or operation of the road that may affect these interactions.

Until further information is available that identifies how the risks to controlled waters will be managed, we are not in a position to be able to agree or disagree with the proposal.

Flood risk
The proposed option 1 routes (northern and southern routes) both cross the River Till, designated a 'main' river, and the option 1 route crosses the River Avon (at Countess roundabout). We shall be able to make further comments upon receipt of the full Flood Risk Assessment.

2) To what extent do you agree with our proposed location of the eastern portal?

	Strongly agree
	Tend to agree
X	Neither agree or disagree
	Tend to disagree
	Strongly disagree
	Don't know

Please provide any comments to support your answer for Question 2

No specific comments to make at this stage.

3) To what extent do you agree with our proposed location of the western portal?

	Strongly agree
	Tend to agree
X	Neither agree or disagree
	Tend to disagree
	Strongly disagree

Cont/d..

	Don't know

Please provide any comments to support your answer for Question 3

No specific comments to make at this stage.

4) Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route? (please indicate your preference with an X)

Option 1N – A northern bypass of Winterbourne Stoke	
Option 1S – A southern bypass of Winterbourne Stoke	
No preference	X

Please provide any comments to support your answer for Question 4

We will be able to provide comment on each of the routes for the Winterbourne Stoke bypass when further details and assessment become available. However, we can provide the following brief comments. There is little difference in the sensitivity of the two routes from a risk to controlled waters point of view. The risk assessment and modelling should consider both routes and identify the one which has the least potential impact. This should then be brought in to the final decision regarding the route to take.

5) What are the most important issues for you as we develop our proposals for the A303/A345 Countess junction?

Groundwater and contaminated land Consideration of risks to groundwater and surface water quality and quantity due to the construction and operation of the road improvements. **Fisheries and biodiversity** Alterations to the river crossing and/or further light/shade/noise disturbance/pollution from drainage impacts. Opportunities for both river and community enhancements. **Flood Risk** Consideration of all sources of flood risk, particularly as the River Avon is located close to the Countess roundabout.

6) What are the most important issues for you as we develop our proposals for the A303/ A360 Longbarrow junction?

Groundwater and contaminated land Consideration of risks to groundwater and surface water quality and quantity due to the construction and operation of the road improvements. **Flood Risk** Consideration of all sources of flood risk.

7) Do you have any other comments?

Groundwater The Environment Agency has a groundwater level monitoring borehole alongside the present road in the vicinity of where the western end of the Winterbourne Stoke bypass sections re-join the present line of the road. It appears that this may be at risk from the development. It is an important monitoring site with the data being used for calibration of groundwater models, resource assessment as part of EU Water Framework Directive requirements and for providing warnings of groundwater flooding in the Till and Wylye valleys and the A303 itself. We would

Cont/d..

therefore wish this borehole to remain or alternative provisions made.

Fisheries and biodiversity
In addition to our 'Other Environment Agency Comments' provided below, which we have previously shared with you, we would expect to see included in the forthcoming EIA impacts of the old A303 route remaining/altered in specification, and any associated mitigation and enhancement.

The eastern river crossing the Avon SAC at Countess Roundabout has been discussed previously and indicated that development would be within the current bridge footprint.

With regard to the tunnel portal design, we will not be able to provide any preferences at this stage until further hydrogeology/drainage/ecological information becomes available. However, we consider that the water system is a critical element in the fundamental function and quality of the surrounding chalk grassland, the integrity of the aquifer and quality input into the Avon SAC, and this needs detailed thought and consultation in due course, alongside the World Heritage Site visual/archaeological considerations.

These comments are the same for the road route towards and from the A360.

In relation to the western river crossing associated with the River Till, the principles given previously about spanning the river outside the flood zone appear to have been taken into account from our discussions. Also that it would be possible in due course to estimate shading impacts as part of the WFD assessment. Location of pillars are yet to be confirmed. The winterbourne status of the River Till, alongside SAC designation, would require careful consideration as to impacts from any altered water input. Any temporary works involving the river will be subject to seasonal ecological considerations, and if known, this can be included in the EIA as avoidance or requiring mitigation.

During land acquisition in this area, there may be opportunities to reduce the current pollution inputs to the river through track improvements and/or altered land use. Opportunities also exist to reconnect the river to the floodplain, to locally reduce flood risk. Also there may be the possibility of first time sewerage schemes.

We would be keen for the A303 project to contribute to the delivery of River Avon Restoration Plan (RARP) objectives and achievement of 'favourable condition' status for the Hampshire Avon SSSI by mitigating for the impact of the road. These schemes vary in scale and location but need to be focused in the vicinity of the proposed river crossings. In particular, the River Till as a whole would benefit from environmental enhancement works and the RARP strategy has estimated the cost of this to be approximately £800k.

Natural Flood Management opportunities should be integrated into the designs where possible.

Opportunities for re-using the dug chalk should be considered.

We appreciate the opportunity to further input into the design considerations at numerous key locations. As mentioned previously, we think it would be useful and beneficial to agree some design/mitigation/construction guiding principles which, if adhered to, would allow the development to avoid significant environmental impact.

Please can we request that all of the aquatic/wetland surveys that you do to formulate your EIA/mitigation, are/will be freely and publicly available, including the raw data.

OTHER ENVIRONMENT AGENCY COMMENTS

We recommend that the following points are also taken into account in the consideration of the A303 road improvements and included in any further assessment of the proposals.

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Environmental Constraints - summary

Route reference	Environmental Constraints
Option 1N (northern bypass) including A303 along to Countess Roundabout	• River Till (Main River) with associated Flood Zone 2 and 3. • River Avon (Main River) and associated Flood Zone 2 and 3 • River Till SSSI • River Avon SAC and SSSI • Salisbury Plain SAC • Potential surface water flooding west of River Till from Parsonage Down • Primary Aquifer
Option 1S (southern bypass) including A303 along to Countess Roundabout	• River Till (Main River) with associated Flood Zone 2 and 3. • River Avon (Main River) and associated Flood Zone 2 and 3 • River Till SSSI • River Avon SAC and SSSI • Salisbury Plain SAC • Primary Aquifer

Groundwater and contaminated land

Both the road and tunnel scheme are passing over a Primary Aquifer, which is highly vulnerable to pollution in an extremely sensitive environment. The chalk aquifer provides a water supply to the public and baseflow to the Hampshire Avon and its tributaries. The route(s) pass through un-mapped source protection zones for smaller abstraction sources.

Both the tunnel and roadways could impact on surface and groundwater quality and quantity. As such should be risk assessed to identify the impact of construction (and potential de-watering) and operation of the tunnel and roadways on surface may have on quality and quantity. Where appropriate mitigation measures should then be proposed and agreed to mitigate in the short and long term such risks.

In particular, the work should identify any receptors, (wells boreholes, springs streams and ponds, groundwater environment) in the vicinity of the scheme by undertaking walk over water interest survey followed by undertaking a qualitative and quantitative risk assessment.

These risks are likely to impact on surface and groundwater quality, from pollution incidents, road run-off and discharges and spills that occur during construction and operation of the scheme.

The construction and operation of roads and tunnels may also impact on surface and groundwater levels and flows, by altering flow pathways, lowering or raising water levels through de-watering, drainage or cuttings or blocking flow pathways. Any risk assessment should consider the points below as other relevant information:

- What water interests/receptors are there within the radial influence of the works
- What will be the radial influence of any development on these receptors (from lowering or raising water levels)
- Where will these impacts be observed and for how long or over what time period
- What volume of water will be intercepted and how will it be disposed of
- What will be the potential impact on water quality
- What drainage will be put in place during construction and post construction and its likely impacts.
- Where will drainage water be discharged and what measures will be put in place

Cont/d..

to protect surface and groundwater quality and prevent flooding.
- What measures will be put in place to ensure sufficient storage is put in place to contain contaminated water (that may result from the operation of the tunnel or as a result of an accident and subsequent fire fighting activities) and ensure it is appropriately discharged.
- What measures will be put in place to ensure road crossings or similar structures do not impact on river flow, particularly where they might cross rivers that ephemeral and or have perched reaches.

As part of this work it is recommended that a quantitative risk assessment is undertaken. The Wessex Basin Groundwater Model could be used to make a preliminary assessment of these impacts on groundwater levels and flow. This is a jointly owned model owned by the Environment Agency and Wessex Water.

We look forward to receiving further details of your proposal so we can recommend any further work that should be undertaken. The list outlined above may not be exhaustive and further assessments may be required.

Flood Risk

All proposed route options would appear to cross main rivers (River Avon and River Till). In addition, other smaller 'ordinary' watercourses may need to be crossed to accommodate the proposed new highway.

Clear open span bridges are the preference at watercourse crossings.

A Flood Risk Assessment will be required in support of the proposed new highway. Generic guidance is available at:-
https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications
Our particular focus will be at main river crossings, where river hydraulic modelling may be required in support of the proposal.

The flood risk management team at Wiltshire Council, in their role as the Lead Local Flood Authority (LLFA), should be consulted to seek their comment in respect of surface water drainage.

Environmental Permit for flood risk activities

In addition to any other permission(s) that you may need to obtain, e.g. Development Consent Order, you may need an environmental permit for flood risk activities (formerly known as Flood Defence Consent prior to 6 April 2016) if you want to carry out work:
- in, under, over or near a main river (including where the river is in a culvert)
- on or near a flood defence on a main river
- in the flood plain of a main river
- on or near a sea defence

For further information and to check whether a permit is required please visit:
https://www.gov.uk/guidance/flood-risk-activities-environmental-permits
For any further advice, please contact your local Environment Agency FRA Permitting Officer, daniel.griffin@environment-agency.gov.uk / yvonne.wiacek@environment-agency.gov.uk

Ordinary watercourses

There may be ordinary watercourses within or in close proximity to your site. If you intend to obstruct the flow in the watercourse (permanently or temporarily, including culverting) you will require prior Land Drainage Consent from Wiltshire Council as the

Cont/d..

Lead Local Flood Authority. You are advised to contact the Drainage Team to discuss their requirements:-
http://www.wiltshire.gov.uk/communityandliving/civilemergencies/drainage/drainageordinarywatercourseconsent.htm

Fisheries, Biodiversity and WFD

Water Framework Directive (WFD)
A WFD assessment may be required for this development. All physical works that alter the physical form of or flow within the river need to be considered for WFD. A WFD scoping exercise will determine whether full assessment is needed. The pertinent guidance has been provided which will guide you through this process: 'Protecting and improving the water environment; Water Framework Directive compliance of physical works in rivers'. It is worth nothing that any river, including non-main river water bodies, should be assessed under WFD where a development may impact upon a WFD water body: for example, works which result in sediment mobilisation on a non-main river have the capacity to impact the WFD status of downstream water bodies. It is worth noting also that the infrastructure associated with each option is pertinent to this assessment. If there is a need to install a culvert on the river for example, this would render the option significantly more impacting than an option which could accommodate a wide spanning road bridge option.

Protected species
Road infrastructure has the capacity to fragment habitat which is particularly damaging if it breaks the linkages of wildlife corridors such as rivers. These wildlife corridors are key for wildlife conservation in general but also for a number of protected species. As such, there is an argument from a protected species/wildlife standpoint that the applicant should aim to work on or adjacent to existing infrastructure in order to minimise further fragmentation of habitat. There is the capacity to mitigate against the impact of habitat fragmentation but the onus is on the applicant to avoid impact in the first instance and only mitigate where impact is unavoidable.

Protected species which are known to be present in the vicinity and which are sensitive to the impacts of this development include but are not limited to otter, bat, badger, water vole and kingfisher. Other protected species to consider include migratory salmonids such as Atlantic salmon, sea trout and European eels. Impacts on habitat should be reviewed under the Salmon and Freshwater Fisheries Act 1975 (SAFFA) as well as Eels (England and Wales) Regulations (2009). Loss of habitat diversity and thus reduction in the availability of essential life stage habitat (spawning, refuge, juvenile habitat etc.) will need to be considered by the project. Whilst at face value this application may appear to have limited impacts on the river system as a whole, the impacts of a reduction in habitat diversity should still be considered. If an uncommon but essential habitat (such as spawning habitat) is lost from an isolated system, the impact is far greater than if the same habitat were lost from a system with good continuity and a plethora of habitat availability. As such you will be expected to demonstrate that any habitat loss will not significantly impact the biological populations, particularly salmonids and eels.

Designated sites
All of the options run through or impact on a protected area of some sort. A guiding principle for this development and options appraisal should be to minimise impacts on protected areas/minimise the quantity of protected areas impacted. Some site designations have greater capacity to be impacted by this development and this should be scoped into a screening exercise as part of the options appraisal process. We would

Cont/d..

expect to see an assessment of the options and their potential impacts on designated sites and species as part of the Habitats Regulation Assessment (HRA).

River Till
The River Till is designated as SSSI and SAC and is known to contain populations of grayling, brown trout and European eel. The WFD status of this water body is currently at good status which is determined by water quality. This water body has routine invertebrate monitoring which is the biological quality element determining the WFD status for this water body. This quality element is currently at high status.

Option 1N (Northern bypass)
It is noted from overhead imagery that this section of the river has scattered tree cover. The applicant should aim to avoid tree and hedgerow removal where practicable. If trees and/or hedgerow must be removed, the applicant should consider options for replanting *in situ.* A ratio of 3:1 replacement to loss is considered bare minimum.

Option 1S (Southern bypass)
This section appears to be heavily tree lined; as above with regards to tree and hedgerow presence/removal. This option also appears to cross directly over a diverse wetland system including a pond, river and adjacent ditches. This option therefore has the capacity to significantly impact the diversity of the aquatic habitat within this system. Areas where habitat of particularly high diversity and/or ecological value is present should be avoided where practicable. It is noted that this whole wetland system falls within the SSSI and SAC classification and thus should be assessed accordingly.

Hampshire Avon
The Hampshire Avon is designated as a SSSI and SAC and is a known migratory salmonid river with populations of Atlantic salmon, grayling, brown trout and sea trout as well as European eel populations. The WFD status of this water body is currently at moderate, the quality element it is failing for is macrophytes. This water body is also assessed for fish and invertebrates and is at good and high status respectively for these biological quality elements.

As part of the Habitat Regulations Assessment (HRA) and WFD assessment, the applicant will be expected to illustrate that there are no acceptable alternatives which avoid impact on designated features and species, so there would have to be robust reasoning to pursue a particular option if it is significantly more damaging than other available options.

Guiding principles which should be considered by the applicant when undertaking options appraisal.

- Minimise impact on designated sites where practicable.
- Minimise impact on protected species, habitat and wildlife where practicable.
- Avoid creating additional river crossings where practicable.
- Rivers should be crossed at right angles and infrastructure should not run parallel to the river where practicable.
- Develop existing infrastructure in favour of installing new infrastructure where practicable.
- Areas where habitat of particularly high diversity and/or ecological value is present should be avoided where practicable.
- Where the development results in a loss of diversity of the riparian and aquatic habitat and ecological communities, the application will be expected to mitigation through like for like, *in situ* habitat enhancement and/or creation to offset the loss.
- Tree and hedgerow removal should be avoided where practicable. Where trees

and hedgerow must be avoided, *in situ* replacement must be considered.

Water quality and pollution prevention
For all options there will be a requirement for a detailed construction management plan, to include the river crossing, to minimise pollution risk.

Waste
In the first instance the design and construction activity should give consideration to the waste hierarchy:

The **waste hierarchy** is what all businesses need to consider when they make decisions on how to manage their waste.

Consignment notes and waste transfer notes must include a declaration that the holder of the waste has applied the waste hierarchy, when deciding what to do with the waste. The five levels of the waste hierarchy are, in order of preference.

Prevention
Prevention includes any action taken before something becomes waste to reduce:

- the quantity of waste produced
- any adverse impacts the waste might have on the environment or human health
- the content of harmful substances in products or materials This could include using less material in the design and manufacture of products, keeping products for longer or re-using them before they become waste.

Preparing for re-use
This includes checking, cleaning or repairing products and components that have become waste so they can be re-used for their original purpose without further processing.

Recycling
Recycling is any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material (such as composting if it is to quality protocol standards).

It does not include energy recovery or reprocessing waste into materials that are to be used as fuels, or for backfilling operations like filling old mine works.

Other recovery
This includes activities such as combustion or anaerobic digestion that produce fuels, heat, power or materials from waste. Backfilling operations also fall into this category.

Disposal
Any activity that is not recovery, such as landfill or certain kinds of incineration.

More information
Defra have published guidance on the waste hierarchy. There is separate guidance for applying the waste hierarchy to hazardous and non-hazardous waste. These are both available on GOV.UK.

- **GOV.UK: Waste hierarchy publications** Waste and Resources Action Programme (WRAP) have an interactive facility on their website to apply the waste hierarchy. Customers can select what type of business they are and the types of waste they produce. This will produce and generate a report that

Cont/d..

provides advice on applying the waste hierarchy.

- **WRAP: Waste hierarchy e-publication guide** Then any surplus materials could be diverted to a number of receiving sites, in the first instance by using the CL:AIR Code of Practice. Links to site and QP list below: http://www.claire.co.uk/projects-and-initiatives/dow-cop/29-executing-dowcop-projects/117-qualified-person-register

  Developer considers options and decides whether to use CoP

  - Puts together audit trail/justification e.g. MMP, Risk Assessment, Verification plan etc.
  - Employs qualified person to audit
  - Declaration issued to EA
  - Materials reused
  - Verification report prepared

There will be a number of U1 Use of waste registered in reasonable close proximity to the chosen route. The U1 allows the use of Waste in Construction predominately farmers maintaining or building tracks. Details of holders of U1s can be obtained off the Environment Agency's public register. There are a small number of recovery permits in Wiltshire / Dorset, which are also listed on the Environment Agency Public Register. Finally there are a number of inert landfill sites as a last resort.

Please note, given the quantity of waste this project will produce it is possible we could apply for, and propose an end of waste agreement on all excavated naturally occurring material.

Opportunities

We would require environmental opportunities to be considered as part of the scheme in addition to any required mitigation. Some points on this are discussed below.

We consider environmental opportunities to be those measures that may be delivered in addition to the mitigation measures required for legal compliance as identified through the Environmental Impact Assessment or other investigations. It would be beneficial to firstly determine what mitigation would be required to address any potential impacts, and then to determine what the opportunities are possible over and above this mitigation. This is highlighted in the following approach when considering issues and opportunities:

1) Identify nature and level of potential impact. Avoid impact if possible.

2) Outline any required mitigation for identified impacts. This should include additional mitigation to pre-empt any issues that may become apparent at later stages, i.e. go further than an absolute minimum.

3) Mitigation must offset the impacts of the scheme and so is more limited/focused on achieving legislative compliance. Opportunities for improvement/enhancement are not limited in this way and as such can and should consider a catchment scale approach.

4) Use a catchment approach to opportunities, i.e., consider opportunities within the River Avon catchment, not necessarily just in the direct vicinity of the A303 road scheme. This is probably a simpler approach for all and also allows more

Cont/d..

flexibility when considering projects/ opportunities, e.g. to achieve River Avon Restoration Programme (RARP) and other purposes.

5) Partnership approach to some projects already exists, so there are already networks that can input to other projects. This also means multiple benefits are achieved.

We have previously provided you a list of suggested opportunities, which were agreed in conjunction with Natural England. We would welcome further discussion on these opportunities, which are summarised below:

- Restoring high nutrient input agricultural land to lower nutrient input uses to reduce diffuse pollution loading.
- Removal of barriers in watercourses and restoring connectivity between rivers and adjacent land.
- Contribute to River Avon Restoration Plan objectives (RARP) in the vicinity of the proposed and existing road crossings e.g. River Till and River Avon.
- Incorporate Natural Flood Management measures into the River Avon catchment, including consideration of linkages with villages with flooding issues.
- Reduce roadside verge erosion from highly eroding locations.
- Incorporate buffer zones alongside watercourses to reduce sediment and nutrients entering these water interests.
- Consider beneficial uses of excavated material from the tunnel
- Installation of sediment traps across roadways within the Avon catchment.
- Measures to improve public access to the countryside

I hope this information is useful, but please contact me if you have any queries.

Yours sincerely

Miss Katherine Burt
Sustainable Places - Planning Specialist

Direct dial 02030 259339
Direct fax 01258 455998
Direct e-mail swx.sp@environment-agency.gov.uk

End

Historic England

From:	McMahon, Phil <Phil.McMahon@HistoricEngland.org.uk>
Sent:	03 March 2017 11:50
To:	A303Stonehenge; Alcorn, Andrew; Parody, Derek
Cc:	Vines, Andrew; Owen-John, Henry; Ramsden, Simon; Wilson, Duncan H
Subject:	Historic England response to A303 Amesbury to Berwick Down public consultation
Attachments:	A303 Stonehenge public consultation response 020317.docx; 2017 CLEAN OUV Assessment Report.pdf

Please find attached a copy of Historic England's response to the public consultation, plus supporting technical report.

Please acknowledge receipt.

We look forward to discussing the response with your team in due course.

Best wishes,

Phil Mcmahon
Inspector of Ancient Monuments
Planning Group
Historic England
29 Queen Square Bristol BS1 4ND
Direct Dial. 0117 975 0699 Mobile. 07900 138612

www.historicengland.org.uk

Historic England

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Historic England

SOUTH WEST OFFICE

Direct Dial: 0117 975 0699

A303 Amesbury to Berwick Down team
A303Stonehenge@highwaysengland.co.uk

Date: 2nd March 2017

Our Ref: PL69442/1

BY EMAIL ONLY

Dear Sirs,

RE: A303 Stonehenge - Amesbury to Berwick Down, response to first phase of public consultation on route options

Role of Historic England

We are the government's expert advisor on England's heritage and we have a statutory role in the planning system. Central to our role is the advice we give to local planning authorities, government departments, developers and owners on development proposals affecting the historic environment.

'Constructive Conservation' expresses the role we play in promoting a positive and collaborative approach to conservation that focuses on actively managing change. The aim is to accommodate the changes necessary to ensure the continued use and enjoyment of heritage assets while recognising and reinforcing their historic significance. Our advice seeks to minimise the loss of significance to these assets. We also look for opportunities to enhance the historic environment.

Prior Engagement

Historic England has been engaged with the current proposals to consider the improvement of the A303 through the Stonehenge World Heritage Site (WHS) since the Department for Transport (DfT) announced a feasibility study to look at potential solutions in early 2014. Prior to April 2015 our engagement took place as part of English Heritage.

Our engagement with the feasibility study primarily took place through a DfT Technical Working Group, together with heritage partners the National Trust, English Heritage and Wiltshire Council. Our constructive engagement in this process was instrumental in the securing the Government's December 2014 announcement that it would invest in a bored tunnel of "at least" 2.9km to improve the A303 through the WHS.

Over the past two years we have continued to provide advice and guidance to the project as it has gone through the process of scoping, sifting and initial assessment of route options. A key aspect of this engagement was our recommendation that the advice of the UNESCO World Heritage Centre (WHC) and their heritage advisors ICOMOS be sought at the earliest opportunity, so that the project had the benefit of their ongoing advice throughout the development of the scheme and identification of routes.

As a result of this an initial Advisory Mission was made at the invitation of UK Government in October 2015. The helpful and constructive mission technical report was received in April 2016, and we acknowledge the positive efforts made by Highways England to absorb the WHC and ICOMOS's recommendations in the drawing up of the current route option proposals.

We also recognise that this present phase of non-statutory public consultation represents Highways England's commitment to demonstrating best practice throughout the life of the scheme's evolution and design, beyond that required by the Development Consent Order statutory process, and that this early stage in identifying route options provides the flexibility necessary to achieve the best possible scheme. We understand that another stage of public consultation on amended /revised proposals will take place later in 2017.

An early achievement in drawing up the parameters of the project was the inclusion within Highways England's over-arching Client Scheme Requirements of commitments "*To contribute to the conservation and enhancement of the WHS by improving access both within and to the site*" and "*To contribute to the enhancement of the historic landscape within the WHS…*"[1] The following advice is mindful both of these welcome commitments and of the preliminary nature of these proposals.

SIGNIFICANCE OF THE STONEHENGE WORLD HERITAGE SITE (WHS)

The Stonehenge WHS forms one half of a larger world heritage property together with Avebury, and was inscribed on the World Heritage List in 1986 as the Stonehenge, Avebury and Associated Sites WHS.

The international significance of Stonehenge and its WHS landscape cannot be overemphasised. As a globally famous and iconic monument and enduring symbol of man's prehistoric past, it is an internationally recognised symbol of Britain. It is difficult to overstate its importance as one of the best-known and best-loved monuments in the world. The Stonehenge World Heritage Site is globally important not just for Stonehenge, but for its unique and dense concentration of outstanding prehistoric monuments and sites, which together form a landscape without parallel.

[1] A303 Amesbury to Berwick Down Technical Appraisal Report, Section 2.2, page 30

The significance of the WHS is well summarised in the Statement of Outstanding Universal Value (SOUV) adopted by the UNESCO World Heritage Committee in June 2013. The full SOUV can be found here: http://www.stonehengeandaveburywhs.org/assets/Stonehenge-and-Avebury-WHS-SOUV.pdf but the key attributes of that significance are worth reiterating:

The Attributes of Outstanding Universal Value of the Stonehenge World Heritage Site

1. Stonehenge itself as a globally famous and iconic monument.

2. The physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites.

3. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the landscape.

4. The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy.

5. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to each other.

6. The disposition, physical remains and settings of the key Neolithic and Bronze Age funerary, ceremonial and other monuments and sites of the period, which together form a landscape without parallel.

7. The influence of the remains of Neolithic and Bronze Age funerary and ceremonial monuments and their landscape settings on architects, artists, historians, archaeologists and others.

The protection of OUV as expressed through these Attributes, together with the Authenticity and Integrity of the WHS are therefore key considerations in assessing proposals within the site or its setting.

POTENTIAL IMPACT OF ROUTE OPTIONS D061 and D062

Historic England

SOUTH WEST OFFICE

Aspects common to both route options (from east to west)

Countess Roundabout/junction – the proposals to improve Countess by means of a flyover for the A303 and grade-separated junction would not appear, from the information available in the consultation documents, to have any significant impact upon the OUV of the WHS, given the baseline condition of this part of the site. However, the infrastructure associated with the junction improvements, including signage, lighting, fencing, cameras etc will require sensitive consideration. Although it appears that all the proposed works will take place within the existing highway land-take, we note the potential for indirect (setting and visual) impacts upon the following designated heritage assets, which will require careful assessment:

- Amesbury Abbey – Grade I, Grade II* and Grade II Listed Buildings, Grade II* Registered Park & Garden
- Amesbury Conservation Area – we note that the northern edge of the conservation area abuts the highway land-take at Countess
- Countess Farm – group of Grade II Listed Buildings on north-west edge of the junction.

From Countess to proposed Eastern Portal – the consultation documents suggest that this section remains entirely within the existing highway land-take up to the point where the road would divert to the north to enter the eastern portal approach. It does not appear that this section will impact upon the OUV of the WHS, however any new signage etc will require very careful consideration.

- **Blick Mead** – whilst of an earlier period than that for which the WHS is designated, this fairly recently discovered Mesolithic site is likely to be of national importance. It lies immediately south of the existing highway land-take along this section of the route. We are aware of concerns regarding the potential impact of changes in the water table as a result of the scheme's development, and the detrimental effect this could have upon the preservation of the site. We understand that the site excavations are due to be published in 2017 and should enable its significance to be properly characterised. In terms of the proposed road improvement, its impact on groundwater levels and hydrogeology must be thoroughly assessed to demonstrate its sustainability and whether there would be any material effect upon the archaeology at Blick Mead.

Eastern tunnel portal – the proposed location of the eastern portal follows one of the key recommendations of the 2016 WHC & ICOMOS report in placing the portal to the east of the Stonehenge Avenue. The Avenue in this location is known to survive as buried archaeological remains and runs nearly perpendicular to the existing A303 dual carriageway, by which it is bisected. By placing the portal to the east of the Avenue and removing the existing A303 from the eastern portal westwards to Longbarrow junction, it brings forward the eventual prospect of making much of its course through the landscape legible or even accessible to future generations.

This would be a significant achievement for the conservation and enhancement of the WHS and a major improvement on the present surface road.

The proposed portal location is also favourable in terms of its archaeological impact. Historic England, as part of the Heritage Monitoring and Advisory Group (HMAG – also set up in response to a recommendation of the 2016 WHC and ICOMOS report) was involved in the design and monitoring of the archaeological assessment and evaluation of the portal site. This work was undertaken to a very high standard and sampled a high percentage of the portal site and approach. Surprisingly, the results demonstrated a very low archaeological presence at this location within the WHS. We understand that Highways England will be making the results of this archaeological work publicly available as soon as it is ready to issue.

The combination of negligible archaeological impact, preservation of the Avenue and the relatively low intervisibility between the portal site and OUV-relevant sites & monuments leads us to the view that the eastern portal proposals are acceptable in-principle and should preserve OUV. However, it is critical that the infrastructure is designed and located sensitively if this improvement is to be properly realised.

The bored tunnel – the twin, fully-bored tunnel of at least 2.9km would deliver huge benefits for the WHS by facilitating the removal of the damaging and intrusive surface road that presently severs the Stonehenge WHS in two. It would entail the removal of the surface dual and single carriageway road from the eastern portal location on the east side of King Barrow Ridge across to Longbarrow junction on the west side of the WHS. This would enable the reunification of the WHS north and south of the current road.

At present, around two thirds of the WHS lie to the south of the A303, effectively isolated from the northern part which contains Stonehenge and the other major ceremonial monuments. The land to the south of the current A303 contains some of the most spectacular groups of funerary monuments and a more diverse landscape than that which visitors are familiar with to the north of the road. At present none of this heritage is promoted for visitors because of the dangers inherent in crossing a busy trunk road.

The bored tunnel presents an opportunity to hugely improve the visitor experience to the whole WHS landscape, opening up new views and new approaches to Stonehenge along public rights of way, in addition to the rich heritage of the southern part of the Stonehenge landscape.

Removal of the surface road via the bored tunnel will significantly enhance the OUV of this part of the WHS, improve the setting of some of the country's most important and best-preserved prehistoric monuments including Stonehenge itself, and restore tranquillity to this ancient landscape.

Western Portal – the western portal position as shown in the consultation documents requires significant improvement. The current location is very close to the Normanton Down barrow cemetery, one of the best preserved and most significant Neolithic and Bronze Age cemeteries in the UK. The portal would certainly have a significant adverse impact upon the setting of this barrow group and upon the OUV of the WHS. In addition, the harmful OUV impact is compounded by the portal location requiring a deep cut into the shoulder of Normanton Down, which will also have a significant adverse impact upon the inter-relationship between the Normanton Down, Lake and Winterbourne Stoke barrow groups – three of the key monument groups that carry OUV.

To ensure that the scheme is fit for this world-class landscape it is essential that the location at which traffic emerges into the landscape is one that can demonstrate it protects the OUV. As part of Historic England and National Trust's consideration of the proposals, we have undertaken an outline assessment of potential OUV impacts, to help inform our position on the two route options presently in consultation. A copy of this technical report[2] is included as an appendix to this response.

We recommend that the report is carefully considered by Highways England, with particular reference to the conclusions on potential solutions for the western portal. Highways England will also need to consider the forthcoming report of the second Advisory Mission that took place at the beginning of February this year to consider the current proposals. The WHC and ICOMOS report should be given due regard in addition to our advice.

West of the Western Portal – here the two options Do61 and Do62 diverge and follow different routes to the western WHS boundary. The following comments are route option specific, followed by issues applicable to both options in this section of the scheme:

2

Historic England and National Trust, *Stonehenge A303 improvement: outline assessment of the impacts on the Outstanding Universal Value of the World Heritage property of potential route options presented by Highways England for January 2017*, 2017

- **D061** – the more northerly of the two options, the proposed route would bisect the Diamond Wood heading due west and leave the WHS approximately 600m south of Longbarrow junction. Archaeological assessment and evaluation was undertaken by Highways England in Autumn 2016 on land to the west of Diamond Wood, in consideration of a previous route iteration. This work confirmed the presence of a suspected long barrow, and identified a further, previously unknown long barrow and a hengiform monument. These newly identified monuments are of direct relevance to the OUV of the WHS and in our outline OUV assessment (see above) have been associated with other Neolithic and Bronze Age monuments to form the Diamond Group

  Whilst D061 has been designed to avoid direct impacts upon this archaeology, it would nonetheless run between the members of the Diamond Group of monuments, severing the most southerly of the long barrows from its neighbours. The severance and negative setting impact of the road cut through such a tightly knit group of monuments directly relevant to the inscription of the WHS would undoubtedly have a significant adverse effect on OUV.

- **D062** – This route option runs through the southern part of Diamond Wood before following a relatively low-lying contour to exit the WHS at a low point approximately 1.3km south of Longbarrow roundabout, passing across the A360 road into the woodland-enclosed field known as The Park.

  This route option seeks to utilise the topography of the WHS to advantage in providing a relatively unobtrusive path through the landscape. However, the consultation materials suggest a working assumption that much of the route would be 'at grade' or even on embankment. Our joint outline OUV assessment with National Trust suggests that a route option such as D062 (or any future variant) must be largely in cutting if it is to mitigate effectively a significant impact of any new road – the sight of heavy goods vehicles moving through the WHS landscape. We refer you to the report and its recommendations in terms of cuttings for the surface road alignment.

  An additional advantage of D062 is that the exit point from the WHS coincides with a small dry valley opposite The Park. Any junction necessary for the A303/A360

interchange would be located within The Park. The design assumption that neither the junction nor the new surface road would be lit is certainly to be welcomed, however it is potentially of concern that the new junction within The Park, and much of the new surface road, will lie on the midwinter solstice sunset alignment as viewed from Stonehenge.

Attribute 4 of the SOUV reminds us that "*The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy*" is an important component of the OUV of the WHS. The scheme will therefore need to demonstrate that the infrastructure can be delivered without harming this attribute of OUV. The midwinter solstice sunset issue is primarily about the potential intrusion caused by approaching headlights, while there is a wider WHS landscape issue to consider around developing infrastructure upon one of the key alignments through the site. Identifying whether there are likely to be any impacts arising from these parts of the route option – and avoiding them - should be an important aspect of the future evolution of the scheme.

- **Archaeological assessment and evaluation** – the Diamond Group of OUV-relevant monuments referred to above was identified through early archaeological assessment and evaluation undertaken to inform a previous route iteration. Historic England was involved in both the design and monitoring of this archaeological work, which was carried out to a very high standard and intensively inspected. The results of that work allowed us a relatively high degree of confidence in the archaeological potential of the areas it covered. Both D061 and D062 were designed to avoid archaeology found in previous investigations, however the new alignments they take through the WHS will themselves require archaeological assessment and evaluation in that same way. It is strongly recommended that this work takes place in consultation with HMAG as soon as possible.

  Until the archaeological character of these routes is understood there remains the risk of significant finds being made along their alignments. Dependent upon the significance of that archaeology (if present) it could prove a substantive constraint to that particular route, therefore an early understanding of archaeological potential is essential.

- **Scheduled linear earthwork along west side of Diamond Wood** – both route options would bisect Scheduled Monument No. 1010837 *Linear boundary from south east of Winterbourne Stoke crossroads to south west of The Diamond on Wilsford Down*. This monument is part a middle Bronze Age land boundary which runs for several kilometres along a general north-west/south-east alignment. A circa 1.2km length of the boundary is scheduled from southwest of Longbarrow junction to south of the Diamond Wood where it survives as an extant earthwork, albeit variably preserved within arable land.

  As it is later than the Neolithic/Early Bronze Age period for which the WHS is inscribed this monument does not carry OUV, but is nonetheless a nationally-important, protected site. Ordinarily Scheduled Monument Consent would be required for the loss of part of this monument, but under the Planning Act 2008 that consent is subsumed within the Development Consent Order process.

  Regardless of how consent is determined, NPPF identifies Scheduled Monuments as one of the most important types of designated heritage asset, and provides plain guidance on the wholly exceptional circumstances in which harm to or loss of part of such an asset might be contemplated. This includes a requirement to set out a clear and convincing justification of the significant public benefits that would be secured in order to offset that harm. We would expect Highways England to set out a strong justification for the loss of part of this linear monument if either of these route options are progressed to a DCO application.

Winterbourne Stoke Bypass – At the time of writing neither bypass option has been subjected to archaeological assessment and evaluation as part of the current scheme. We recommend that this is progressed as soon as possible to inform considerations over the best route around Winterbourne Stoke. Our concerns with regard to the WHS will be in terms of avoiding harmful impacts upon its setting caused by the route outside its boundary, however we are aware that there is a very rich archaeological potential for archaeology of all periods (not just OUV-relevant) within this landscape and the advice of Wiltshire Council's Archaeology service should be sought to assist in this.

RELEVANT POLICY FRAMEWORK

International - In 1984 the UK ratified the World Heritage Convention 1972, article 4 of which requires State Parties to do "*all they can, to the utmost of their abilities*" to protect

and transmit the OUV of their WHSs. Details on the scope and nature of relevant protection efforts are set out in the Operational Guidelines for the Implementation of the World Heritage Convention (World Heritage Committee 2005).

In addition, ICOMOS International, heritage advisers to the UNESCO World Heritage Centre, has produced supplementary guidance on Heritage Impact Assessments (HIA) for development within WHSs (ICOMOS 2011), to gauge the effect of proposals on OUV. It recommends an iterative series of HIAs, undertaken as a project moves from initial scoping through design and application. We are aware that Highways England has commissioned HIA iterations for the early stages of the scheme, but note that a full and thorough Heritage Impact Assessment in line with the ICOMOS 2011 guidance will be required to accompany any scheme going forward.

As noted above, the special qualities of the WHS were formally set out in the Statement of Outstanding Universal Value (SOUV) adopted by the WH Committee in June 2013. The SOUV describes the Attributes of OUV that are central to the significance of the WHS. Importantly, these not only refer to Stonehenge and its relationship to the other major monuments, but also to the relationship between individual groups of monuments themselves and the value of night skies & relevant astronomical alignments. The value of the whole WHS as a "landscape without parallel" is also recognised as an Attribute.

National - As a nationally-significant infrastructure project (NSIP) the A303 Stonehenge Improvement will seek consent via the Development Consent Order (DCO) process under the Planning Act 2008. Schemes seeking DCO must demonstrate that they comply with relevant international treaties to which the UK is a signatory. The 1972 World Heritage Convention is one such treaty.

The DCO process follows the policy and guidance in the National Planning Policy Framework (DCLG2012), supplemented by the online Planning Practice Guidance (Gov.uk website). Both sources contain clear guidance on how to approach historic environment issues within the context of development. NPPF identifies World Heritage Sites as one of the most important forms of designated heritage asset, whilst the supplementary PPG contains further guidance on how to treat WHSs, including a link to the ICOMOS 2011 HIA guidance.

Local - the scheme should comply with the 2015 Stonehenge and Avebury WHS Management Plan, which contains a series of policies agreed by all WHS partners (including Highways England) for the protection & enhancement of the WHS. The Plan includes policies on the impact of roads and transport and broadly states that solutions to intrusive traffic issues, including the A303, should protect the OUV of the WHS. The Plan carries weight in the local planning process and although the current Plan has not been formally

adopted as SPD it can be expected to be a document of interest in consideration of the DCO.

From our prior engagement in the scheme we are aware that Highways England and their consultants are working to all of the policy requirements set out here, in order to develop a scheme fit for the WHS – we encourage them to continue work closely with us and other heritage partners to ensure the emerging scheme accords with this strong raft of policy protection.

HISTORIC ENGLAND POSITION

Both options D061 and D062 include a tunnel of at least 2.9km within the Stonehenge World Heritage Site. This would remove the majority of the existing damaging A303 road and its traffic from the WHS, finally reuniting the north and south sides of this extraordinary ancient landscape and allowing people to enjoy and understand it better. It would also allow for the reinstatement of the line of the Stonehenge Avenue, the ancient processional route to the stones. This is the first time that a scheme to improve the A303 within the Stonehenge landscape has recognised and respected the importance of the Avenue.

However the current proposals for the tunnel's western portal are a cause for significant concern. This is due to the portal's current proximity to the Normanton Down barrow group and the wider adverse impacts on OUV presented by its position. We hope that these concerns can be resolved with careful and sensitive revision to the positioning and design of the western portal. This is a key issue to resolve for the development of a successful scheme that we would be able to support through the DCO process.

We are committed to working with Highways England to find an alignment and design for the western portal and new western surface road that is appropriate for this internationally-important place and protects its Outstanding Universal Value.

We believe that this scheme presents the best chance in a generation to resolve the long-running traffic problems that blight the WHS, and that the current proposals contain many positive aspects which deserve recognition. They represent a huge opportunity to develop a road improvement within the WHS, but the scheme must improve its western elements for this to be the exemplary scheme that the Stonehenge WHS so deserves.

Yours sincerely,

P.A. Mc

Historic England

SOUTH WEST OFFICE

PHIL MCMAHON
Inspector of Ancient Monuments
phil.mcmahon@historicengland.org.uk

Enclosure: Appendix 1, Historic England and National Trust, *Stonehenge A303 improvement: outline assessment of the impacts on the Outstanding Universal Value of the World Heritage property of potential route options presented by Highways England for January 2017*, 2017

Laverstock and Ford Parish Council

highways england

862 183

13 JAN 2017

A303 Stonehenge questionnaire

Highways England is consulting at an early stage on options to upgrade the A303 between Amesbury and Berwick Down, past Stonehenge, to dual carriageway. This form is to help you give us feedback on our proposals during our public consultation. The deadline for responses to this consultation is 5 March 2017.

More information about the consultation can be found by:

- joining us at one of our exhibition events where information will be on display, with members of our team on hand to answer your questions, and where our Public Consultation Booklet will also be available to pick up
- visiting us online at www.highways.gov.uk/a303stonehenge/consultation where you can also find our Public Consultation Booklet, plus view and download maps and other information
- by calling 0300 123 5000.

How to tell us your views

Feedback can be sent to us through any of the channels listed below. The deadline for responding is midnight on 5 March 2017.

- Freepost A303 STONEHENGE CONSULTATION.
  This questionnaire, or any other feedback, can be posted to the Freepost address above. If using this address, please write it exactly as shown, on a single line, otherwise it may not be delivered.
- Online questionnaire – An online version of the questionnaire can be completed on our project website www.highways.gov.uk/a303stonehenge/consultation.

What we are consulting on

During this stage of consultation, we would particularly like to hear your views on the following topics to help us as the project goes forward:

- Our proposals to upgrade the A303 to dual carriageway.
- Local information, issues and concerns – we would like to hear about anything that you think would be relevant relating to the local area, any specific issues you would like to see addressed, or any concerns you may have about potential impacts.

About you

Name	HILARY DAVIDSON
Postcode	SP1 3FS
Email	hdavidson399@gmail.com
Postal address	7 St Peter's Rd Bishopdown Farm Salisbury

This is optional but providing your email or postal address will allow us to update you with any news on this consultation.

Are you responding on behalf of an organisation? ☑ Yes ☐ No

If yes, which organisation? LAVERSTOCK & FORD PARISH COUNCIL

D) A303/A345 Countess junction

This is the first roundabout on the way from London on the A303 and a major bottleneck. We plan to replace this with a new junction that separates the traffic going east-west along the A303 from traffic going north-south along the A345 Countess Road.

The layout of this junction has not been confirmed but it could involve the A303 being carried on a flyover above the existing roundabout.

For more information on this junction please refer to page 39 of the Public Consultation Booklet.

5. What are the most important issues for you as we develop our proposals for the A303/A345 Countess junction?

Limit traffic disruption as much as possible. Flyover could work — but do not disrupt traffic for years while flyover is being built.

E) A303/A360 Longbarrow junction

There would be a new junction located between the existing A360 and Winterbourne Stoke that would separate traffic going east-west along the A303 from traffic going north-south along the A360. It would also connect Winterbourne Stoke to the A360 and the new A303.

The layout of this junction has not been confirmed as its arrangement will be determined by the choice of bypass for Winterbourne Stoke.

For more information on this junction please refer to page 44 of the Public Consultation Booklet.

6. What are the most important issues for you as we develop our proposals for the A303/A360 Longbarrow junction?

No comment.

7. Do you have any other comments?

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England	☐
Received an email from Parish Clerk.	☑
Social media (e.g. Facebook or Twitter)	☐
Newspapers or magazines	☐
Posters or other outdoor advertising	☐
TV or radio	☐
Other online/website sources	☐
Word-of-mouth	☐
Local authority	☐
Other source	☐

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Great to have opp'y to discuss project with reps/consultants here.

B) Western portal

The proposed location for the western portal would be to the south west of Normanton Gorse, putting it out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the western portal please refer to page 42 of the Public Consultation Booklet.

3. To what extent do you agree with our proposed location of the western portal?

- [ ] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [x] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 3

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

For more information on the two possible routes for the bypass please refer to page 45 of the Public Consultation Booklet.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke	☐
Option 1S– A southern bypass of Winterbourne Stoke	☐
No preference	☑

Please provide any comments to support your answer for Question 4

Excellent idea to bypass Winterbourn Stoke & only way to offer dual carriageway. No views re alternatives offered.

Continued over

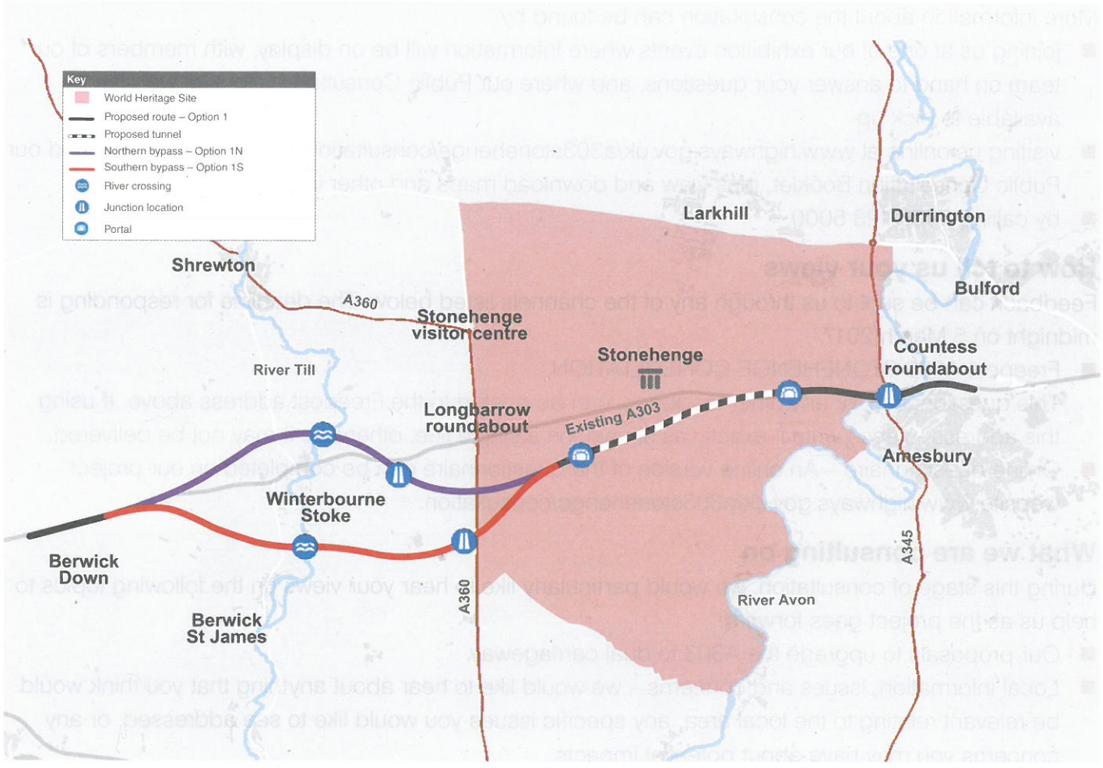
A303 Stonehenge - The proposed option

On the evidence of our assessment to date, we are proposing a route for the A303 Amesbury to Berwick Down scheme that would comprise:

- a 1.8 mile tunnel with approach roads within the Stonehenge, Avebury and Associated Sites World Heritage Site
- a bypass of Winterbourne Stoke either to the north or south of the village
- improvements to the existing junctions between the A303 and the intersecting A345 and A360

For more information on how we arrived at our proposed option please refer to Chapter 6 of the Public Consultation Booklet.

The proposed option is shown on the plan below.



1. To what extent do you agree with our proposed option?

- ☐ Strongly agree
- ☐ Tend to agree
- ☐ Neither agree nor disagree
- ☐ Tend to disagree
- ☑ Strongly disagree
- ☐ Don't know

Please provide any comments to support your answer for Question 1

The A tunnel is not the optimal solution. Your posters state that 'traffic affects visitors' engagment' - have you done surveys that show this is the case? The A303 is over 1/4 mile away from Stonehenge. Most visitors will not be interested in walking miles to look at barrows, especially in the inclement weather of UK, so argument that current A303 splits heritage site is irrelevant. Given that many of the items of archaeological interest will be underground, less damage would be done, & it would be cheaper, to widen the road instead.

Key features of the proposed option

A key feature of the proposed option is the location of the tunnel portals. Our assessment has identified indicative locations for the portals.

A) Eastern portal

The proposed location for the eastern portal would be to the east of King Barrow Ridge and where the line of The Avenue crosses the existing A303, ensuring the portal is out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the eastern portal please refer to page 41 of the Public Consultation Booklet.

2. To what extent do you agree with our proposed location of the eastern portal?

- ☐ Strongly agree
- ☐ Tend to agree
- ☐ Neither agree nor disagree
- ☐ Tend to disagree
- ☑ Strongly disagree
- ☐ Don't know

Please provide any comments to support your answer for Question 2

See comments above. Entrance to tunnel will be ugly, claustrophobic and create worse bottlenecks in event of car breakdowns / accidents etc.

Ministry of Defence (MOD)

Gittins, Jedd

From: DIO ODC-LMS SE2 (Ashcroft, Sarah Mrs) <DIOODC-LMSSE2@mod.uk>
Sent: 03 March 2017 13:16
To: A303Stonehenge
Subject: 20170303 - A303 Stonehenge Consultation

Please see attached comments from DIO on behalf of the MOD

As a Government Department the Ministry of Defence (MOD) has no preference to the proposed routing of the A303 North or South at Winterbourne Stoke. The MOD is encouraged by the proposed route of the dual carriageway of the A303 through / under the World Heritage Site as this should reduce the traffic 'rat run' through Larkhill.

It was mentioned through our engagement with representatives from Highway England and ARUP Atkins that the tunnel would not be the authorised route for abnormal load; this route would be via the Packway at Larkhill from the current Countess and Longbarrow roundabout sites. This route does give us cause for concern as abnormal loads would be transiting through a predominantly residential area where families and young children frequently walk and play. Currently the Parkway is used for abnormal loads only when the parallel section of the A303 is closed. If this route is to become the preferred route then traffic frequency of abnormal loads will increase.

If this is to be the case then the western end of the Packway at Rollestone Camp corner needs altering (B3086). It is suggested that the road is widened and the traffic flow priority altered; the main flow from east / west should be changed so that the natural flow and route of the road is from the Packway and down to the A303, thus traffic from Shrewton should give way at Rollestone Camp corner.

Although not directly relevant to the MOD, appropriate signage should be displayed at the Stonehenge visitor centre roundabout detailing the abnormal load route and not to obstruct that part of the road.

Please feel free to contact me if any further comment is needed.

Sarah Ashcroft

Principal Estate Surveyor

Land Management Services Asset Strategy and Portfolio

IDL 415, Zone 1, Floor 2, Ramillies Bldg, Marlborough Lines, Monxton Road, Andover SP11 8HJ

Telephone 07717 427076

Natural England

Response ID ANON-BABJ-X6VG-T

Submitted to **A303 Stonehenge**
Submitted on **2017-03-01 16:27:06**

Introduction

Name

Name:
Charles Routh

Postcode

Postcode:
SP3 4ET

Email

Email address:
charles.routh@naturalengland.org.uk

Postal address

Address:
Natural England, Cherry Lodge Farm, Shrewton, Wiltshire. SP3 4ET

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Natural England

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Don’t know

Please provide any comments to support your answer for question 1:
In general terms we advise that the proposed option can in principle deliver benefits to the natural environment, specifically to biodiversity, landscape and public access to nature, through the undergrounding of a section of the A303. Whether it would do so in practice is contingent on detailed design and survey information.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:
We have no comment except insofar as it influences the western portal location.

3. To what extent do you agree with our proposed locationof the western portal?

Don’t know

Please provide any comments to support your answer for question 3:
Our only concern about the location of the western portal is as it may impact on the breeding success of stone curlew nearby at Normanton Down.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
As neighbouring landowner we prefer the southern bypass option (hence our tick box response above).
As statutory adviser on the natural environment, we are unable to advise on which route would be better. However, we advise that the two options are likely to have different effects on the natural environment as follows:
Public enjoyment of the Parsonage Down National Nature Reserve (NNR)
One of the statutory roles of NNRs is the provision of opportunities for public enjoyment of nature and/or open-air recreation (Natural Environment & Rural

Communities Act 2006). The northern bypass is likely to result in significantly greater levels of road traffic noise, and form a visually intrusive element in the landscape as viewed from parts of the National Nature Reserve. These will significantly detract from the landscape and tranquillity of the National Nature Reserve, and the consequent public enjoyment thereof.
Biodiversity
In the absence of detailed survey information, we are uncertain what the biodiversity impacts of the two options will be, and thus are unable to advise on which option would be better for biodiversity.
Landscape
In the absence of a detailed Landscape and Visual Impact Assessment we are unable to advise on impacts and thus advise on which option would be better in terms of landscape and visual impact.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Our primary concern relates to ensuring the River Avon SAC is not negatively impacted during the construction or operation phases of the project.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Landscape impact
The location for the junction for the southern bypass on figure 11 appears well enclosed, and thus a relatively good location. The location for the junction for the northern bypass appears to be of higher visual prominence. Siting, design and mitigation opportunities should be taken to reduce the landscape impact from this junction whichever option is chosen.

7. Do you have any other comments?

Q7:
Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.
Natural England's comments relate to our advice vis-à-vis the natural environment. Some of our comments also relate to Natural England as a neighbouring landowner, and these have been specified. Our advice does not extend to wider matters.
There are a number of matters that we are unable to advise on at this stage, as the information is not yet available. We would be glad to advise as such information becomes available.
As set out during informal discussions, there are a number of matters which should be addressed by the scheme.
European sites
Any option must demonstrate that it will not have an adverse effect on any European sites. The ones of particular concerns are: Salisbury Plan SAC (air quality impacts to Parsonage Down together with south of Bulford Camp if traffic volumes are predicted to increase), Salisbury Plain SPA (impacts to nesting stone curlew due to changes in recreation patterns, road land take, and disturbance from new road alignment), and River Avon SAC (shading at new crossing point, dewatering of tunnel operations, water quality from construction and operation).
Opportunities/positive legacy
Natural England strongly endorses seeking opportunities to enhance the natural environment and deliver more than "no net loss" from the scheme.
As well as general opportunities along the route corridor to deliver enhancements (e.g. road verge design and management for biodiversity), specific opportunities include:
Using spoil for biodiversity enhancements. We have identified a location which appears to offer a good opportunity to make positive use of a significant quantity of spoil, and would particularly welcome the opportunity to discuss this further. There may be additional opportunities to make positive use of spoil for biodiversity elsewhere.
Opportunities for improving public access to Parsonage Down National Nature Reserve. Both options 1N and 1S will reduce public access to Parsonage Down NNR due to the closure of access from the A303 to the byway near Yarnbury Castle. A significant proportion of the visitors to the Reserve access it this way. Public enjoyment is a primary purpose of National Nature Reserves, and as such opportunities to mitigate this impact should be taken. We have a number of potential measures in mind, and would welcome the opportunity to discuss this further.
Opportunities to improve the condition of the River Avon SAC. The scheme provides a number of potential opportunities to implement aspects of the River Avon Restoration Plan. We have provided details of what these might look like in conjunction with the Environment Agency.
We would welcome the opportunity to discuss all of these matters further.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
We welcomed the visualisations and sound representations of the proposals. However, in a noisy room the sound representations were of no value. Natural England are concerned about the noise impacts of the proposals on the NNR, and would welcome any bespoke modelling of the likely effects.

North Wessex Downs Area of Outstanding Natural Beauty

Response ID ANON-BABJ-X34H-P

Submitted to **A303 Stonehenge**
Submitted on **2017-03-05 18:22:26**

Introduction

Name

Name:
Henry Oliver

Postcode

Postcode:
RG17 0UN

Email

Email address:
henryoliver@northwessexdowns.org.uk

Postal address

Address:
North Wessex Downs Area of Outstanding Natural Beauty
Units 3 and 4
Denford Manor
Lower Denford
Hungerford
Berkshire

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
North Wessex Downs Area of Outstanding Natural Beauty (member of the Avebury WHS Steering Group)

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
Proposals would:

devastate the landscape of a substantial part of the WHS and its setting, notably on the western side, with a surface dual carriageway on a new alignment;

seriously harm the Outstanding Universal Value of the WHS by intruding on the winter solstitial alignment, Bronze Age field systems and barrow assemblages at the western end, and newly discovered and emerging archaeological features and significance at the proposed eastern portal;

by destroying the archaeology of a significant part of the WHS through construction of a new road, deprive future generations of the opportunity to explore and discover more about the site and its (pre)history using methods and technology not yet known; and

risk lasting damage to the reputation and credibility of the World Heritage Site as a whole, including, and especially relevant in the case of the North Wessex Downs, the Avebury half of the WHS.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
We understand that the proposed portal could seriously and irrevocably harm the ability for future generations to understand and appreciate the significance of emerging discoveries close to the proposed eastern portal.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
The location of a portal and associated surface road construction in the WHS or affecting its setting is irresponsible and wholly unacceptable. It should not even be contemplated by the Government. The proposed site of the western portal would harm the integrity of the solstitial alignment of the stone circle at Stonehenge - precisely the part o the site which the proposals purport to conserve and enhance.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
Both alignments would seriously harm landscapes that are attractive and valued. We have not seen enough information at this stage to be able to assess and judge the relative impacts.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Minimising the impact on the WHS, for example we believe a N-S A345 flyover should be considered as likely to have a much less damaging impact on the WHS than the proposed E-W A303 flyover.

Minimising harm to the setting of the WHS and the wider historic and natural environment, including noise impact, external light and diffuse pollution from road run-off.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Minimising harm to the setting of the WHS and the wider historic and natural environment, including noise impact, external light and diffuse pollution from road run-off.

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Other online/website sources

Other source:

Email

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Extremely poor level of public information and consultation, for example in Salisbury and the Avebury part of the WHS.

When they addressed the two WHS Steering Groups, Highways England staff were completely unable to provide requested information or answer obvious questions about the environmental impact of the options or obvious alternatives such as a long bored tunnel that conserved the WHS and its setting. It was clear that HIghways England had neither properly assessed the relative impacts, nor considered obvious alternatives as required by the SEA Directive, and was unable to answer questions about historic and natural environmental impact.

Shrewton Parish Council

From: Nikki Spreadbury-Clews <shrewtonparishcouncil@gmail.com>
Sent: 05 March 2017 15:15
To: A303Stonehenge
Subject: A303 consultation - I request acknowledgement that this letter has been sent to the relevant team and a feedback reference number please
Attachments: 2017.03.05 Feedback on A303 proposal.docx

Please find attached letter from Shrewton Parish Council regarding the A303 consultation.

Please acknowledge that this letter has been sent to the relevant team and I request a feedback reference number.

Kind regards

Nikki Spreadbury-Clews
Parish Clerk
On behalf of Shrewton Parish Council
077986 880164

Check the shrewton.com website for information on the parish council

Shrewton Parish Council
Camberley House
Clay Street
Crockerton
Warminster
BA12 8AG

Telephone: 01985 216660
Email: shrewtonparishcouncil@gmail.com
Web: www.shrewton.com
5th March 2017

Sent electronically to:-
info@highwaysengland.co.uk
a303stonehenge@highwaysengland.co.uk

Feedback on A303 Proposal

Shrewton Parish Council would like to give the following feedback on the A303 proposal, we have also completed the online consultation.

1. Shrewton parish Council are aware that should the tunnel be closed for any reason, the alternative route would be via the A345, Larkhill and south from Rollestone Crossroads back to the A303 – and vice versa. Rollestone crossroads has been highlighted as dangerous and plans have been drawn up to ease the turn, in both directions, while creating turn offs for Shrewton and the Bustard. This improvement should be part of the earliest work and so be available should the construction work require the alternative route to be used.
2. Shrewton Parish Council feel strongly that the junction to the A360 should be close to the existing route of the A360, regardless as to whether a North or South bypass for Winterbourne Stoke is chosen. Should the junction move west – as currently shown for the North bypass option – the shorter route between Shrewton and the A303 junction would be via Salisbury road (B3083) and Winterbourne Stoke and vice versa – an invitation to rat run. In the built-up section of Shrewton, the road is narrow and has no pathways. We do not believe traffic management solutions designed to reduce this 'rat running' would be an adequate alternative.

Yours sincerely,

Mrs Nikki Spreadbury-Clews
Clerk
On behalf of Shrewton Parish Council

Response ID ANON-BABJ-X365-5

Submitted to **A303 Stonehenge**
Submitted on **2017-03-04 11:30:26**

Introduction

Name

Name:
Shrewton Parish Council

Postcode

Postcode:

Email

Email address:
shrewtonparishcouncil@gmail.com

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Shrewton Parish Council

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
Shrewton Parish Council are aware that should the tunnel be closed for any reason, the detour would be via the A345, Larkhill and south from Rollestone Crossroads back to the A303 - and vice versa. Rollestone crossroads has been highlighted as dangerous and plans have been drawn up to ease the turn, in both directions, while creating turn offs for Shrewton and the Bustard. This improvement should be part of the earliest work and so be available should the construction work require the detour to be used.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
None

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

Shrewton Parish Council feel strongly that the junction to the A360 should be close to the existing route of the A360, regardless as to whether a North or South Bypass for Winterbourne Stoke is chosen. Should the junction move west - as currently shown for the North bypass option - the shorter route between Shrewton and the A303 junction would be via Salisbury Road (B3083) and Winterbourne Stoke and vice versa - an invitation to rat run. In the built up section in Shrewton, the road in narrow and has no pathways. We do not believe traffic management solutions designed to reduce this 'rat running' would be an adequate alternative.

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Local authority

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

The Parish of Berwick St James

From: Neil MacDougall <neil.macdougall@me.com>
Sent: 03 March 2017 10:44
To: A303Stonehenge
Cc: Till Valley
Subject: Response ID - ANON-BABJ-X6VN-1
Attachments: Final letter to Andrew Alcorn V4.pdf; EPR PEA A303 Bypass FINAL 1C 20170301 _Full.pdf; JSP A303 Acoustics report to HE.pdf; M60065.01 Mabbett Report FINAL 020317.pdf; VTC Letter 270217 (1).pdf; APPENDIX A – Requests for Information to HE from the CPSTV.pdf

Dear Sir,

Reference: Response ID - ANON-BABJ-X6VN-1

Please find attached PDF copies of the Berwick St James submission and supporting reports. These are being hand delivered in hard copy today to the Offices The Hub 500 Park Avenue, Aztec West, Bristol, BS32 4RZ. This is as per the telephone conversation between Julian Glyn-Owen and Mr Chris Jones today. May we thank Chris for his help thus far.

1) Chaimans Letter of introduction
2) Mabbett Report
3) Mabbett Appendix A
4) EPR Report
5) VEctor Transport Consultancy Report
6) JSP Consultants Report

Please may we have a reply email acknowledging receipt of this submission.

Yours faithfully

Neil MacDougall
Chairman Berwick Parish Meetings.

The Leat House
Berwick St James
Salisbury
Wilts SP3 4TL

Tel: 01722 792761
Hp: 07502 565456

Email: berwickstjames@icloud.com

Andrew Alcorn (A303 Stonehenge Public Consultation)
Highways England
Bristol Office
Temple Quay House
2 The Square
Temple Quay
Bristol
ES1 6HA

Our Reference: ANON-BABJ-X6VN-1

3 March 2017

Dear Mr Alcorn,

A303 STONEHENGE AMESBURY TO BERWICK DOWN – BERWICK ST JAMES RESPONSE

OUR SITUATION

In addition to this submission from Berwick St James, the Campaign for the Preservation of the Southern Till Valley (CPSTV) has submitted a formal report that embraces the whole of the southern Till valley. Given the seismic impact of the decision and that almost all of the proposed southern bypass runs through our parish, we, as the Trustees of the village of Berwick St James, need to impress upon you the concerns which we have with the proposals. We should stress that we support the need for the tunnel and a bypass of Winterbourne Stoke – our concerns lie in the options for providing it.

So, the top-level issues are:

COMMUNITY, ECONOMY, ECOLOGY, HYDROLOGY

We wish to raise concerns across a wide range of topics, notably significant adverse impacts on the community through permanent separation of our two historic Norman villages, permanent damage to our local businesses, and destruction of a vital part of the River Till SSSI that will have major downstream impacts through the Avon SAC.

ARCHAEOLOGICAL IMPACT

There is a site of untouched archaeological interest south of Normanton Gorse, and has remained undisturbed for many thousands of years. There is a sensible solution that avoids this location whilst ensuring smooth connectivity to the aspired route. In siting the western portal north west of Normanton Gorse parallel to the existing A303, the impact on the ancient history of the landscape is minimised and this reflects the survey work conclusions of the published 2003 scheme.

PROCEDURAL

Secondly, we also have considerable concerns relating to every stage of this consultation process. As most people have discovered, there is a paucity of information released to the public by Highways England (H-E), and it is therefore impossible to comment fully on the proposals. It is quite apparent that the amount of information supplied by Arup Atkins and H-E on which local residents are expected

to base their concerns, is at a very different level to the degree of detail that people who live here believe is necessary for them to make an informed choice. Assurances have been given by H-E that local concerns based on inadequate information would be fully addressed, but only after the decision to select one of the two bypass options had been made. An appropriate analogy might be to expect someone to jump into one of two tanks of water when blindfolded; one of which has sharks in it. The assurance given would be that the sharks would be removed the following day: this is clearly unhelpful!

WHAT WE HAVE DONE

To provide substance and support our position, the community has gone to considerable efforts since the 12th January 2017 to achieve the following:

- Formed a representative body called the 'Campaign for the Preservation of the Southern Till Valley' whose membership embraces individuals across a significantly wider section of the Till valley.
- Reached a consensus of opinion that the northern route is the clearly best option, but not as currently presented.
- Established relationships with external bodies such as Environment Agency, Natural England, World Heritage groups, Wiltshire Unitary Council and Wiltshire Wildlife Trust, JNCC and others.
- Raised a fund through voluntary donations to support the engagement of professional consultants, whose reports are enclosed with this letter.
- Delivered four public meetings relating to the consultation to inform concerned residents and wider interested parties.
- Collated individual subject matter expert (SME) research reports on a range of technical matters which have also been presented to H-E.

DISCUSSION OF KEY CONCERNS

The Parish Community is united in objecting to the southern bypass option.

The southern bypass option is a proposal that will deliver a permanent barrier both visually, socially and economically through this community. It is a huge concern to all. We are two Norman villages, of equal precedence in terms of history, contribution to the local archaeology, family history and our two churches are linked by nearly a thousand years of worship and footpaths. Design mitigation efforts will never deliver any degree of meaningful healing to the damage caused by such a severe and permanent structure through the southern Till valley. The impact of such an enormous rift on our thriving community, ecology and local businesses both now and in the future can only be devastating.

The residents cannot understand why the proposed northern bypass option around Winterbourne Stoke is not exactly the same in position and profile as was agreed back in 2005. Importantly, this was largely accepted by both the landowners and the community of Winterbourne Stoke. It is of note, however, that the new proposed northern bypass is viewed by residents as being significantly less acceptable when compared to the 2005 plan.

The late exposure to us of a southern bypass option, coupled with an unattractive and less-than-acceptable northern option - which is significantly higher in profile than the 2005 version – has been upsetting and worrying for most residents.

Communities north of Winterbourne Stoke are extremely concerned that the proposed position of the A303/A360 interchange on the northern route will do nothing to alleviate the rat-run through Shrewton and will be inconvenient to drivers from all directions. This point was raised to H-E by Shrewton's Deputy Parish Chairman, Darren Henry at a meeting on 23rd February 2017. But there is a pragmatic solution in the relocation of the junction back to the A360/Longbarrow roundabout and which adjustment is supported by us and the community of Shrewton. In detail; positioning the new round-a-bout in the south-west quadrant below the existing junction, would minimise the archaeological impact.

The ecological outlook for the Till valley is of considerable concern: we enclose a study that concludes that the overall impact on the ecology here is significantly greater than on the northern route.

We have considerable and, as yet, unanswered concerns about the hydrological impacts do not seem to have been appropriately considered: this ranges from the initial construction through to the life-long impacts of the structures and run-off on the valley.

OUR SUBMISSION

We attach 4 key reports that you will want to examine with your team: the first and most important being a report by Mabbett, who we have contracted to examine the proposals and processes. They have:

- Undertaken to deliver an independent critical review of the consultation process and quality of information presented to the public in order to make an informed choice on the route options.
- Identified concerns expressed by the CPSTV community.
- Supported the preparation of a consultation response from the CPSTV community to HE.

We have also attached the three further detailed assessments by EPR (Ecology Consultants), Vector (Road Design Consultants) and JSP (Acoustic Consultants).

Please acknowledge receipt of this letter and the enclosures.

Yours sincerely,

N. R. H. MacDougall
Chairman Berwick St James Parish Meetings

Councillor I. West
Wiltshire Councillor for Berwick St James

Enclosures:

1. Mabbett Report.
2. EPR.
3. Vector.
4. JSP Consultants.

Response ID ANON-BABJ-X6VN-1

Submitted to **A303 Stonehenge**
Submitted on **2017-03-01 18:12:12**

Introduction

Name

Name:
Neil MacDougall, Parish Chairman

Postcode

Postcode:
SP3 4TL

Email

Email address:
berwickstjames@icloud.com

Postal address

Address:
The Secretary, Parish of Berwick St James, The Barn, Salisbury, Wiltshire, SP3 4TN

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
The Parish of Berwick St James

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Neither agree nor disagree

Please provide any comments to support your answer for question 1:
Please see our full Chairman's response in email form submitted under the same response number as this questionnaire.

This format does not provide for the response our Parish wishes to make and further to suggestions by Mr Chris Jones and Mr Derek Parody, we are using the response number to link with our longer and more detailed response via email.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:
Please see our full Chairman's response in email form submitted under the same response number as this questionnaire.

This format does not provide for the response our Parish wishes to make and further to suggestions by Mr Chris Jones and Mr Derek Parody, we are using the response number to link with our longer and more detailed response via email.

3. To what extent do you agree with our proposed locationof the western portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 3:
Please see our full Chairman's response in email form submitted under the same response number as this questionnaire.

This format does not provide for the response our Parish wishes to make and further to suggestions by Mr Chris Jones and Mr Derek Parody, we are using the response number to link with our longer and more detailed response via email.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
Please see our full Chairman's response in email form submitted under the same response number as this questionnaire.

This format does not provide for the response our Parish wishes to make and further to suggestions by Mr Chris Jones and Mr Derek Parody, we are using the response number to link with our longer and more detailed response via email.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Please see our full Chairman's response in email form submitted under the same response number as this questionnaire.

This format does not provide for the response our Parish wishes to make and further to suggestions by Mr Chris Jones and Mr Derek Parody, we are using the response number to link with our longer and more detailed response via email.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Please see our full Chairman's response in email form submitted under the same response number as this questionnaire.

This format does not provide for the response our Parish wishes to make and further to suggestions by Mr Chris Jones and Mr Derek Parody, we are using the response number to link with our longer and more detailed response via email.

7. Do you have any other comments?

Q7:
Please see our full Chairman's response in email form submitted under the same response number as this questionnaire.

This format does not provide for the response our Parish wishes to make and further to suggestions by Mr Chris Jones and Mr Derek Parody, we are using the response number to link with our longer and more detailed response via email.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Local authority

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Please see our full Chairman's response in email form submitted under the same response number as this questionnaire.

This format does not provide for the response our Parish wishes to make and further to suggestions by Mr Chris Jones and Mr Derek Parody, we are using the response number to link with our longer and more detailed response via email.

Preliminary Ecological Appraisal

A303: Winterbourne Stoke Bypass Options D061 and D062

Final Report
March 2017

P16/59-1C

Preliminary Ecological Appraisal
A303: Winterbourne Stoke Bypass Options

Report Release Sheet

Issue Number:	P16/59 – 1C
Date:	1 March 2017
Client:	Campaign for the Preservation of the Southern Till Valley
Main Authors:	Karen Colebourn BSc (Hons) CBiol FCIEEM Andrew Cross BSc (Hons) MSc MCIEEM
Contributors:	Ben Blowers BSc (Hons) Grad CIEEM
Report Prepared for Issue by:	…… Andrew Cross BSc (Hons) MSc MCIEEM
Report Approved for Issue by:	…… Karen Colebourn BSc CBiol FCIEEM

Doc. No EPR 10 Issue 04

Ecological Planning & Research Ltd
The Barn, Micheldever Station, Winchester, Hampshire SO21 3AR
Tel: 01962 794720 Fax: 01962 794721 email: info@epr.uk.com

Preliminary Ecological Appraisal
A303: Winterbourne Stoke Bypass Options

Contents

Summary

Ecological Planning & Research Limited was commissioned in February 2017 by the Campaign for the Preservation of the Southern Till Valley to provide information for the comparative assessment of ecological impacts arising from two alternative options for the Winterbourne Stoke Bypass: D061 and D062, to the north and south of Winterbourne Stoke respectively.

The village of Winterbourne Stoke is in the River Till valley in Salisbury Plain. The River Till rises on the Plain and flows south through Winterbourne Stoke and Berwick St James, on to the River Wylye and beyond into the Avon. The River Till is a Site of Special Scientific Interest (SSSI). It is a chalk stream that is seasonally dry to the north of the Winterbourne Stoke but generally flows throughout the year (except in extreme circumstances) south of the village. The River Till is part of the River Avon system, a system that is recognised as one of the most biodiverse chalk river systems in Europe and which has been designated as the River Avon Special Area of Conservation. Part of the Salisbury Plain SAC - Parsonage Down SSSI – lies to the northwest of Winterbourne Stoke.

Features of ecological importance - European and National sites, together with other features of ecological importance on the chalk farmland either side of the Till Valley - that could be affected by the southern route, are considered in this appraisal, which has the following five elements:

- Prediction of the likely biophysical changes arising from the southern bypass;
- Review of the ecological context to identify Important Ecological Features which could be affected by the predicted changes.
- Assessment of the potential impacts that could arise from these changes;
- Summary of the legal and policy consequences; and
- Comparison of the route options.

The conclusion was that the southern route D062 is likely to generate more ecological impacts than the northern route D061. This is principally because the southern route would affect the features for which the River Avon SAC and the River Till SSSI are designated more profoundly than the northern route would. The southern route would also affect Stone-curlew, one of the species for which the Salisbury Plain SPA is designated and a range of locally important features which would either not be affected by the northern route, or would be affected less severely.

The northern route could result in air quality changes to an area of Parsonage Down SSSI, which is part of the Salisbury Plain SAC.

As there are likely to be significant effects on European Sites, the Habitats Regulations make it clear that alternative options must be compared, and the least damaging option selected. Further, the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 and the National Planning Policy Framework (NPPF) require the same approach to be applied to features of less than European importance.

The conclusion of this preliminary ecological appraisal is that the northern route D061 is the preferred option.

Preliminary Ecological Appraisal
A303: Winterbourne Stoke Southern Bypass Option

1. INTRODUCTION

Commission

1.1 Ecological Planning & Research Limited (EPR) was commissioned in February 2017 by the Campaign for the Preservation of the Southern Till Valley (CPSTV) to provide information for the comparative assessment of ecological impacts arising from two alternative options for the Winterbourne Stoke Bypass.

Background

1.2 Highways England (HE) has consulted the public about options for proposals to improve the A303 Stonehenge – Amesbury to Berwick Down. The 2017 A303 Amesbury to Berwick Down Technical Appraisal Report Public Consultation document (hereafter referred to as TAR) considers two options for bypassing Winterbourne Stoke: the D061 passing to the north and D062 to the south of the village. Both routes are as illustrated in Figure 3 of the TAR. This EPR report focusses on the differences between the two options in the sections from the A360 westwards to where they both re-join the existing alignment of the A303. This EPR report does not address ecological impacts which are common to both options.

1.3 A previous scheme was subject to environmental assessment and public consultation, culminating in a Public Inquiry in 2003. This earlier scheme included a similar route to option (D061) to the north of Winterbourne Stoke. The 2003 scheme did not progress. No such in-depth assessment of the effects of the southern option has been assessed via EIA or tested at Public Inquiry.

1.4 In response to a request for the ecological data on which HE is relying to inform their assessment of the route options, EPR was referred to pages 252-267 of Section 18 of the TAR, in which the whole environmental assessment is summarised. Biodiversity is discussed on page 264.

1.5 At Paragraph 18.3.44 of the TAR, HE predicts that both options could result in a 'Large Adverse Effect' on the River Avon Special Area for Conservation (SAC) and the River Till Site of Special Scientific Interest (SSSI). Predicted impacts to other important ecological features are summarised in paragraphs 18.3.45 to 47 of the TAR. CPSTV believes, however, that the HE has failed to recognise that more significant ecological effects may arise from the southern option. They therefore commissioned EPR to identify and describe the important ecological features which could be affected by the predicted impacts arising from the southern option. Where possible these have been compared with those predicted from the northern scheme.

1.6 This information is supplied to assist Highways England to discharge its biodiversity duties under the Natural Environment and Rural Communities Act and the Conservation of Habitats and Species Regulations 2010 (as amended). These duties are translated into HE's objective set out in their Public Consultation Booklet, under Environment and community:

> *"To improve biodiversity and provide a positive legacy for nearby communities."*

The study area

1.7 Winterbourne Stoke lies at the southern edge of the Salisbury Plain. The River Till rises on the Plain and flows south through Winterbourne Stoke and Berwick St James, into the River Wylye, all of which are part of the River Avon catchment. The Till is a seasonally dry to the north of the present A303, but to the south generally flows throughout the year (Last, 2013 and see Annex 1). As discussed below, the southern option D062 is predicted to generate impacts which could affect the Till and the River Avon system. The River Avon system, including the Till, is recognised as one of the most biodiverse chalk rivers in Europe. This system is a designated Special Area of Conservation (SAC) and a Site of Special Scientific Interest (SSSI). Other features of ecological importance on the chalk farmland either side of the Till Valley, which could be affected by the southern route, are also discussed. Parsonage Down SSSI (an outlying area of the Salisbury Plain SAC) could be affected by changes in air quality.

Scope

1.8 EPR's approach takes account of the Chartered Institute of Ecology and Environmental Management's (CIEEM) advice in Guidelines for Ecological Impact Appraisal in the UK and Ireland (Jan 2016).

1.9 The report comprises five main elements:

- Prediction of the likely biophysical changes arising from the southern bypass;
- Review of the ecological context to identify Important Ecological Features which could be affected by the predicted changes.
- Assessment of the potential impacts that could arise from these changes;
- Summary of the legal and policy consequences; and
- Comparison of the route options.

Methods and Constraints

1.10 Information for this report was obtained by desk research, liaison with local naturalists and a site visit. Desk research on the study area included reviewing information held by the Joint Nature Conservation Committee (JNCC) on European Sites and Natural England for Sites of Special Scientific Interest.

1.11 Karen Colebourn BSc CBiol FCIEEM, a planning ecologist, and Andrew Cross BSc (Hons) MSc MCIEEM a botanist and historic landscape/ecology specialist, both of EPR, visited the bypass options area on 20 February 2017. Surveys at this time of the year allow an overview of the landscape and habitats but are constrained because features may be for example difficult to identify; dormant or not yet present in the landscape.

1.12 In addition to the desk and field work, EPR met the following local naturalists on 20 February 2017, to collect and discuss local records:

- Mr Peter Hayes (from the Wilton Fishing Club);
- Mrs Barbara Last (botanist and author);
- Mrs Anika Lange; and
- Mr Neil MacDougall.

1.13 In addition to biological records and information from the above, Mr Tim Bale and Mrs Pauline Stephenson – both of whom are very familiar with the nature of the study area - have also provided, respectively, information on the aquatic ecology of the Till and bird records for the Berwick St James parish.

1.14 EPR has followed Highways England (paragraph 18.2.30 of the TAR) in that the route corridor is shown as extending to 75m either side of the centre line of the route options.

2. NATURE AND EXTENT OF PREDICTED IMPACTS

2.1 **Table 2.1** below summarises the changes associated with the construction of the southern bypass option D062 that may generate ecological impacts.

Table 2.1: Activities that may generate ecological impacts

Preliminary activities prior to the main construction phase
ground investigations;
vegetation clearance; and
archaeological excavation
Construction phase
vegetation/habitat clearance including tree felling.
soil stripping;
movement of materials to/from or within the site;
accidental discharge/spillage of construction and excavated materials, oils, fuel and chemicals;
demolition operations;
acoustic disturbance and vibration from construction activities;
piling, causing disturbance to springs and groundwater flow
assembly areas for components of construction;
diversion or reduction of water levels to facilitate construction;
discharge of dewatering fluids
dust generation;
run off from dust suppression methods
on-site borrow pits;
lighting;
provision of services and utilities;
setup and subsequent removal of site offices/compounds and final site clearance after construction;
structural works for new road; and
plant maintenance.
Operational phase
road drainage;
traffic movement;
lighting; and
physical presence of new road and associated infrastructure.

2.2 The above activities are predicted to generate the changes to the study area set out in **Table 2.2** below.

Table 2.2: Summary of predicted changes and Zone of Influence (ZoI)

Predicted Change	ZoI	Duration
Ground disturbance by structural and any archaeological investigations, storage of plant and materials, assembly of component parts, provision of services and utilities, site compounds, soil stripping and structural works.	150m wide route and working area	Prior to and during construction
Vegetation clearance	150m wide route and working area	During construction
Change in water regime if water levels altered to facilitate construction	River Till, fen and meadows and lower chalk stream	During construction and operation
Sediment runoff from soil stripping, earthmoving during construction of embankments and cuttings, and within the River floodplain during construction of viaduct. Ongoing sediment runoff from embankments until vegetated or stabilised. Water runoff from dust suppression and other activities	River Till, fen, meadow, transport of fine sediments into Lower Till and River Avon system	During construction and operation
Increased risk of water pollution arising from storage and movement of materials, fuels and chemicals and from construction plant and traffic	River Till, fen and meadows, lower Till chalk stream and River Avon system	Prior to construction, during construction and during operation.
Increased noise and vibration from pre-construction, construction and traffic movements	Beyond working area for noise. 40m for vibration.	Prior to construction, during construction and during operation
Potential fracture of chalk substrate and disruption to existing groundwater flows due to intrusive ground investigations and piling operations for viaduct.	Middle Till fens and meadows, lower Till chalk stream and River Avon system	Site investigations and construction
Increased risk of neglect as grazing will be less attractive	Swamp and Riverside Meadows	
Increased lighting	River Till, fen and woodland	During construction and operation
Demolition of structures	150m wide route and working area	During construction
Increased traffic movements	Route	During operation
Increased shading	Route	During operation
Changes in Air Quality	Within 200m of the route	During operation
Landscape planting	Site	During operation

3. ECOLOGICAL CONTEXT

Introduction

3.1 The route of the proposed Southern Bypass from approximately the western portal westwards to where it re-joins the existing A303 is shown on **Map 1**. The route passes through an undulating chalk plateau and crosses the River Till Valley. The British Geological Survey (BGS) maps the bedrock geology in the study area as the Sleaford Chalk Formation that is locally overlain in shallow, dry valleys with Head deposits and by Head and Alluvium deposits on the Till valley floodplain. The BGS maps show that the Till valley north of Winterbourne Stoke on the bypass route to be Head whereas to the south of Winterbourne Stoke, the valley floor is Alluvium with Head in adjacent valleys.

3.2 Winterbourne Stoke lies at point on the River Till where the River Till differs between a seasonal, summer-dry winterbourne to the north and a more permanent year-round stream to the south. The first edition 25 inch to the mile OS map marks several valley floor/valley edge springs just south of Winterbourne Stoke and these likely mark the transition from winterbourne to year-round stream. Sample water flow measurements by Wessex Water for the River Till and the hydrological part of the SSSI citation are given in **Appendix 1**.

3.3 The landscape setting in which the bypass is described under the following:

- National Character Area 132 Salisbury Plain and West Wiltshire Downs
- Natural Area 80 South Wessex Downs; and
- Landscape Biodiversity Area 08 Salisbury Plain.

3.4 These landscape descriptions set out the importance of:

- the chalk stream as a one of the most important features defining this landscape; and
- the importance of habitat connectivity for the future of biodiversity.

Historical Ecology

3.5 The proposed southern route passes through the historic parish of Berwick St James. This parish has large areas of enclosed land (parish enclosure was c.1790) with areas of ancient countryside associated with the floodplain. The flood plain has relict water meadow features. Very small areas of downland are shown on the land utilisation survey map of 1939 but there were extensive pastures within the parish covering approximately the same proportion of the parish as the arable lands. Since then there has been an expansion and intensification of arable farming and consequently a near total loss of pastures on the plateau.

Features of Ecological Importance

3.6 The features of ecological importance on the route of the proposed bypass are listed in **Table 3** below. These features have been identified from various sources including the TAR; MaGIC/DEFRA and the Campaign for the Preservation of the Southern Till Valley (CPSTV), supplemented by a site visit on 20 Feb 2017. Information regarding the location of spawning Salmon and of Brook Lamprey was provided by Mr Peter Hayes and Ms Anika Lange has provided the approximate location of Stone Curlew Plots.

Table 3: Summary of important ecological features on the southern bypass route that could be affected by the predicted changes

Important local Ecological Features	Estimated importance, condition and trend
River Avon SAC	International importance for vegetation, fish and invertebrates Mostly favourable condition, but declining due to recreational impacts.
Salisbury Plain Special Protection Area (SPA)	International importance for birds including Stone Curlew
River Till SSSI	County – International importance for vegetation, fish, otter, water vole and invertebrates. Unfavourable Recovering condition. NE identify the Till as within the River Restoration Strategy as part of the remedy to its ecological issues.
Fen, Marsh, Swamp and Wet Woodland outside SSSI	Local Importance (where outside designated national/county sites) Unfavourable condition as most derelict or fertilised Declining in quality (fertilisation)
River-side meadows	Local importance Unknown condition and trend
Field Trees in Till Valley	Local importance. Included here are trees (e.g. Oak; Ash and Willow) on the floodplain and adjacent fields. Some are relicts of ancient boundaries, others are long established field trees. Maintained condition. Declining through lack of recruitment.
Beech Plantations on chalk plateau and slopes	Local importance. The Beech Plantations are characteristic of the post enclosure chalk landscape in the Parish. Some of the plantations (e.g. The Park) are over 100years old. Favourable and Maintained condition.
Protected Road Verge	Local Importance. Hold flora and fauna of conservation interest. 2 verges are in the zone of influence: one is on the A303 and the other on a lane to the west of the River Till between Winterbourne Stoke and Berwick St James.
Birds of Conservation Concern: Great Bustard	This species is in an active re-introduction phase. IUCN lists this species as Red List Vulnerable and is a EU Birds Directive Annex 1 species. Importance, condition and trend unknown.
Birds of Conservation Concern: Stone Curlew	EU Birds Directive Annex 1 species; NERC Act S41 species. This bird is being actively conserved in the parish, with input from Natural England and RSPB. County Importance Condition and trend unknown
Birds of Conservation Concern: Barn Owl	Listed on the Wildlife & Countryside Act Schedules. This species is known to breed in the area. Importance, condition and trend unknown.
Assemblage of Bats	Local – County Importance Most species within the assemblage are declining nationally due to loss of roosts and degradation of supporting habitats (see Bat Conservation Trust Guidance 2012).

4. POTENTIAL ECOLOGICAL IMPACTS FROM THE SOUTHERN BYPASS OPTION

4.1 The changes identified in Section 2 could impact on the important ecological features identified in Section 3 as set out in **Table 4** below. **Maps 2** and **3** show, respectively, the location of the southern bypass '150m corridor' where it crosses the SAC and the SSSI. **Map 4** shows the habitat mosaic in the land adjacent to the SAC and SSSI. **Map 5** shows the wider landscape with beech plantations and locations of Stone Curlew and Greater Bustard in the Berwick St James parish.

Table 4: Summary of Important Ecological Features and Potential Impacts arising from southern route option D062

Important local Ecological Features	**Potential Impacts**
Rive Avon SAC	Contribution to loss/degradation of habitat for species for which SAC was selected, particularly chalk stream with water buttercup, Salmon, Bullhead, Brook Lamprey and Desmoulin's Whorl Snail). High potential for disruption to the groundwater flows and springs which support the habitats in the Till for the above species. Potential for permanent disruption to habitat connectivity for SAC species along the River Till valley, including prevention of Salmon reaching spawning area. Increased risk of sedimentation and pollution
Salisbury Plain SPA	Disruption to breeding Stone-curlew on SPA supporting habitat near the southern route.
River Till SSSI	As above for the SAC impacts but also includes potential for fragmentation and degradation of habitat for SSSI features including Brown Trout; Grayling; Water Vole and Otter, including reduction in prey species. Loss of SSSI habitats - wet woodland and swamp.
Fen Marsh and Swamp (those outside SSSI)	Loss of fen marsh and swamp vegetation on River Till floodplain. Degradation and fragmentation of habitat.
Riverside Meadows	Degradation and fragmentation of habitat.
Field Trees in Till Valley	Loss of field trees.
Beech Plantations on chalk plateau and slopes	Loss of 100+ year old trees and plantation habitat. Increased disturbance to retained habitat adjacent to bypass corridor.
Protected Road Verges	Loss of habitat and species
Birds of Conservation Concern: Stone Curlew	Disturbance to breeding habitat and landscape connectivity for this species.
Birds of Conservation Concern: Barn Owl	Loss of nesting and foraging areas. Disturbance to retained areas. Increased risk of road accidents.
Assemblage of Bats	Potential to lose roosts and disrupted habitat connectivity for this species group using the mosaic of habitat along the Till valley and connecting woodland habitat.

5 COMPARISON WITH THE WINTERBOURNE STOKE NORTHERN BYPASS OPTION

5.1 At paragraph 18.3.46 the HE mentions that there are differences between the ecological impacts of the northern and southern options, but provides no detail. The information set out in **Table 5** below provides evidence with which to compare the potential impacts of the two options.

5.2 HE has found that both route options could cause potential impacts on the Salisbury Plain SAC and Special Protection Area (SPA). Deposition of airborne pollutants such as NOx seems to be the most likely issue. As the northern option is closer to these protected sites, it seems likely that this route will increase the risk more than the southern one. However, most NOx is deposited within 200m of the source, and the effect of the prevailing wind must also be taken into account.

5.3 The Great Bustard has been re-introduced to Salisbury Plain, but no information is available to assess the likely effects. It has therefore not been included in the table below.

Table 5: Comparison of the potential ecological impacts of Options D061 and D062

Important Ecological Feature	Potential impacts of northern option D061 v Southern Option D062
River Avon SAC	
Chalk stream vegetation [SAC 3260 vegetation]	Reduced risk in the northern option as the stream does not flow above Winterbourne Stoke for much of the year. The northern vegetation will have higher resilience to any alteration of groundwater levels, caused by abstraction or dewatering required for construction.
Salmon and Brook Lamprey	The stream north of Winterbourne Stoke is upstream of springs and thus a more seasonal waterbody than south of the village. The area to the north of winterbourne Stoke is less favourable habitat for salmon and lamprey. Southern option may prevent salmon from full range of spawning grounds. The northern option is likely to have less of an impact on these species as it crosses a more seasonal watercourse. Use of the northern option provides a 2-3km buffer zone between potential sources of sediment and pollution, and the sensitive perennial sections of the Till. This also applies to any aquifer drawdown effects.
Bullhead	Bullhead has been reported as spawning within 200m of the southern route option. Reduced risk in the northern option as this species may only be present when the winterbourne is flowing.
Desmoulin's Whorl Snail	Recorded in Berwick St James. Unlikely to be present in the winterbourne and therefore less vulnerable to the northern option.
Salisbury Plain SPA	
Hen Harrier	Insufficient information to assess effects.
Hobby	
Quail	
Stone-curlew	This species is actively encouraged to breed on habitat outside the SPA boundary and is present very close to the southern route option. At this location, it is likely to be severely affected by disturbance during construction and may be affected by noise and vibration during operation of the new road.
Salisbury Plain SAC/Parsonage Down SSSI	
Chalk grassland vegetation [SAC 5130 and 6210 vegetation]	The northern route runs parallel to the southern edge of the SAC/SSSI and within 200m for much of this section and thus potentially affected by Air Quality issues, although limited to 200m from road and limited by prevailing wind. Reduced risk from southern option as the route is further from the Salisbury Plain SAC and different alignment.

Important Ecological Feature	Potential impacts of northern option D061 v Southern Option D062
River Till SSSI (See above for features shared with SAC)	
Fen, marsh and swamp vegetation.	Southern route likely to cause greater risk of loss, pollution and hydrological damage.
Wet Woodland	Not present on the Till at the northern option. Direct loss of wet woodland habitat on the southern bypass option
Water Voles	Loss and degradation of habitat on southern route. No appropriate habitat within northern route.
Otters	Less likely to be affected by northern route, as the winterbourne is dry for much of the year.
Brown Trout and Grayling	Less likely to be affected by northern route, as the winterbourne is dry for much of the year.
Features of Local Importance	
Fen, Marsh and Swamp and Riverside meadows outside SSSI	Direct loss of habitat for both options and increased risk of pollution and air quality changes. Potential impacts to grazing management for retained pastures nearby. Loss of peaty soils on southern route and changes to hydrological regime underpinning soil.
Field Trees	Ash pollards at risk from northern route. Southern route may affect oak, ash and willow.
Beech plantations	These would be removed, fragmented and degraded by the southern route. No effect from the northern route.
Barn Owl	These birds forage over fields affected by both the north and southern route options, but are known to nest in woodland that would be affected by the southern option.
Assemblage of Bats	Both routes would affect foraging habitat, but the southern route would also disrupt flight lines and remove roosting habitat.

6 CONCLUSIONS & LEGAL AND POLICY IMPLICATIONS

6.1 As set out in **Table 5** above, the southern route D062 is likely to generate more ecological impacts than the northern route D061. This is principally because the southern route would affect the features for which the River Avon SAC and the River Till SSSI are designated more profoundly that the northern route. The southern route would also affect Stone-curlew, one of the species for which the Salisbury Plain SPA is designated and a range of locally important features which would either not be affected by the northern route, or would be affected less severely.

6.2 The northern route could result in air pollution effects on a small part of Salisbury Plain SAC and the Parsonage Down SSSI within the SAC.

6.3 Section 4 of the TAR sets out the legislation and policy which applies to the determination of the proposed scheme. At paragraph 4.2.1 of the TAR, the HE 'states that the proposed scheme is a Nationally Important Infrastructure Project. Given the World Heritage Site status of Stonehenge, it might even be of higher importance than that. This must be considered when determining whether to go ahead with the scheme.

6.4 However, when, as in this case, there are likely to be significant effects on European Sites, the Habitats Regulations make it clear that alternative options must be compared, and the least damaging option selected. Further, the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 and the National Planning Policy Framework (NPPF) require the same approach to be applied to features of less than European importance.

6.5 Consequently, the conclusion of this preliminary ecological appraisal is that the northern route, D061 is the preferred option.

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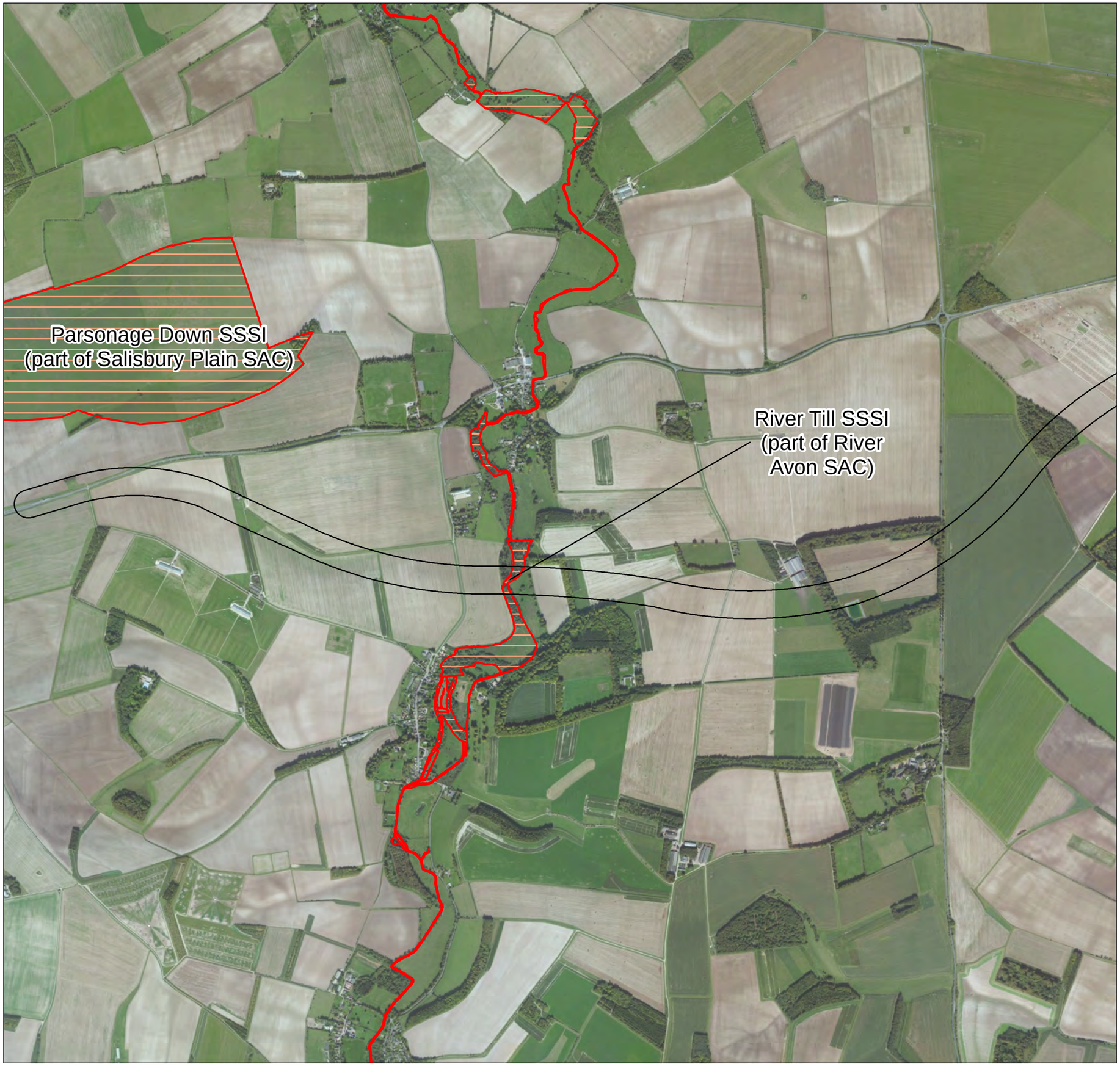
PEA: A303: Winterbourne Stoke Bypass Options
Maps



MAP 1 Landscape of Southern Bypass Route

KEY

SAC & SSSI

Road outline

The Bypass width is here shown as 150m based on the Biodiversity Assumptions in A303 Stonehenge Amesbury to Berwick Down. Technical Appraisal Report Volume 1 Para 18.2.30.

SCALE: 1:20,110 at A3

0 250 500 750 1,000 Metres

N

Ecological Planning & Research

CLIENT: Campaign for the Preservation of the Southern Till Valley

PROJECT: Winterbourne Stoke

DATE: February 2017

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P16/59

Chalk stream with Water Buttercup Habitat

The location where the Southern Bypass option crosses the River Till (a component of the River Avon SAC) shows the habitat complex needed by the SAC fish species. Included here are the clean gravels, the bank vegetation, swamp and waterside trees. This section of the SAC is downstream of a number of springs and is part of a year round watercourse.

MAP 2 River Avon SAC

KEY

Road outline

SAC & SSSI

SCALE: 1:3,000 at A3

0 50 100 150 200 Metres

N

Ecological Planning & Research

CLIENT: Campaign for the Preservation of the Southern Till Valley

PROJECT: Winterbourne Stoke

DATE: February 2017

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P16/59

SSSI habitats under proposed crossing

The location where the Southern Bypass option crosses the River Till SSSI (a component of the River Avon SAC) has clean gravels, bank vegetation and wet woodland for SSSI features including salmon, lamprey, bullhead, brown trout, grayling water vole; otter and Desmoulin's Whorl-snail.

SSSI habitats south of proposed crossing

MAP 3 River Till SSSI between Winterbourne Stoke and Berwick St James

KEY

Road outline

SAC & SSSI

SCALE: 1:12,500 at A3

0 200 400 600 800 Metres

N

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CLIENT: Campaign for the Preservation of the Southern Till Valley

PROJECT: Winterbourne Stoke

DATE: February 2017

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P16/59

The River Till floodplain between Winterbourne Stoke and Berwick St James is a mosaic of chalk stream channels (artificial and natural) in between wet woodlands; swamp; alluvial grasslands; rush pastures, field trees and relict hedgelines. This habitat complex supports the SAC and SSSI features of interest as well as providing interconnecting habitat for bats, birds and mammals extending southwards to the River Wylye.

Habitat Mosaic on the River Till Floodplain

MAP 4 Habitat Complexity and Connectivity on the River Till valley

KEY

Road outline

SAC & SSSI

SCALE: 1:8,000 at A3

0 50 100 150 200 Metres

N

EPR

Ecological Planning & Research

CLIENT: Campaign for the Preservation of the Southern Till Valley

PROJECT: Winterbourne Stoke

DATE: February 2017

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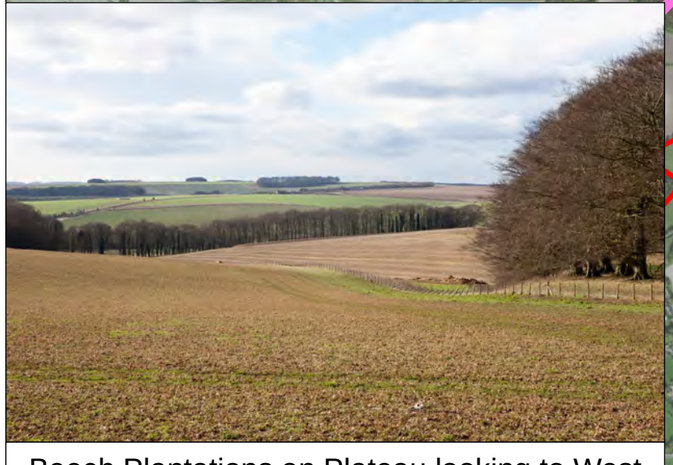
Beeches in The Park

Stone Curlew area

Records for Great Bustard



Beech Plantations on Plateau looking to West

MAP 5 Landscape and Biodiversity on the Chalk Plateau

KEY

Road outline

SAC & SSSI

The post enclosure landscape of plantations and tracks. These features are now over 100years old and are locally distinctive. They provide habitat otherwise unavailable in the arable landscape of extensive fields for species such as Barn Owls. Also present in the landscape are Stone Curlew and Great Bustard

SCALE: 1:20,000 at A3

0 250 500 750 1,000 Metres

N

Ecological Planning & Research

CLIENT: Campaign for the Preservation of the Southern Till Valley

PROJECT: Winterbourne Stoke

DATE: February 2017

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P16/59

Appendix 1

Extract from IFM Conference Paper 2008: Fish out of water-use of the River Avon winterbournes

Introduction

Winterbournes occur in the upper reaches of many chalk streams and are so called because they only flow in the winter and typically dry during the summer and autumn. An example of this seasonal change on the River Till is provided in Figure 1 below.

Figure 1 - Seasonal change at Winterbourne Stoke on the River Till

The four hydrological zones are represented in a winterbourne signature from the River Till in Figure 3.

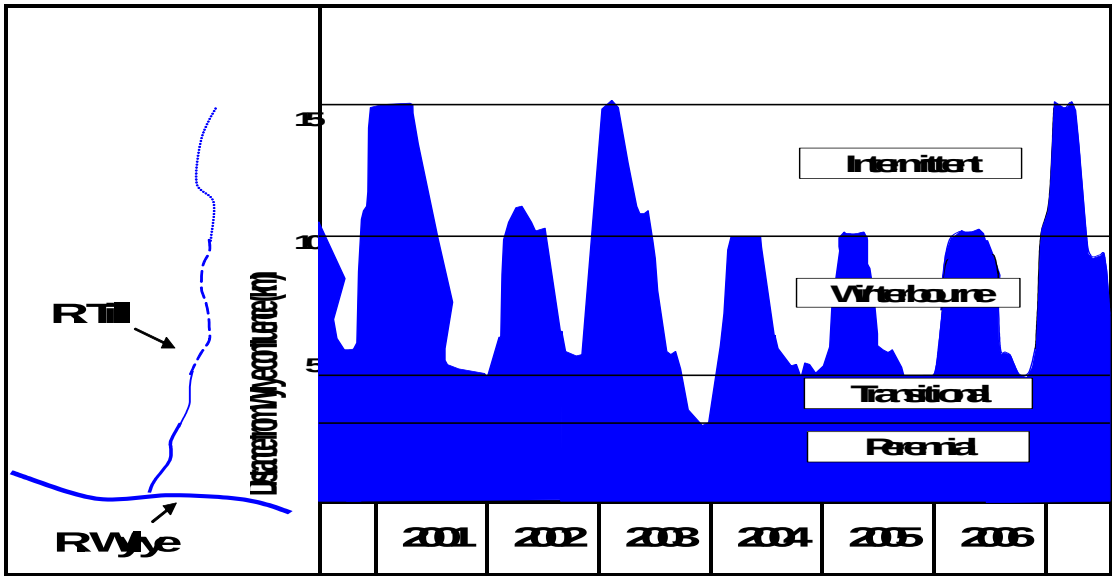

Figure 3 - Winterbourne signature of the River Till

Both figures extracted from Extract from: IFM Conference 2008. '*Fish out of water- use of the River Avon winterbournes*'. Andy House, Neil Punchard and Fiona Bowles

Extract from SSSI Citation at https://designatedsites.naturalengland.org.uk

Hydrology/Hydrogeology

1. *The River Till is a tributary of the River Wylye, itself part of the River Avon System SSSI. It is spring fed from the aquifer underlying the Chalk plateau of Salisbury Plain and flows through predominantly chalk geology. The upper part of the Till is a winterbourne, supported by water flowing from the aquifer in winter and early spring. As aquifer levels fall to a more stable level in summer, the river flows from a perennial head in the mid-section of the Till. The lower section, downstream from this, has the character of a chalk stream.*

    a. The citation therefore refers to three sections, classified into either Winterbourne (Upper section), or Chalk Stream (middle and lower sections) (see citation maps at https://designatedsites.naturalengland.org.uk/SiteUnitList.aspx?SiteCode=S2000431&SiteName=&countyCode=19&responsiblePerson=).

2. The upper winterbourne section is mapped to extend just to the south of the A303.

3. Based on local knowledge (Last, 2013)[1], the lower perennial section is considered to commence at Asserton House and to run approx. 3km south to the confluence with the River Wylye, and almost always containing permanent running water[2].

4. Within the middle section of the River Till, there is a junction of the upper and middle chalk layers in the vicinity of Berwick St James, resulting in a number of springs arising in and around the River (Plate 1), and forming a perennial head which is thought to typically arise in a wetland to the north of the Village. At this location, the soils of the River bed abruptly change from the gravel beds typical of the upper section, to clay based alluvium, which is likely to arrest any shallow subsurface groundwater flowing from the north, thereby contributing to the arising springs and marshy wetlands dominant in this section (see discussion on ecology below). The middle section of the River Till effectively functions as transitional zone between the upper winterbourne and the lower perennial sections, with the amount of aquifer recharge from yearly rainfall influencing both the amount of subsurface groundwater flowing from the northern upper section, as well as the pressure of the perennial head, both of which determine how far north and upstream perennial water in the middle section sits each year.

    a. All sections of the Till are influenced by abstraction by Wessex Water. The winterbourne section has been reported as being only marginally affected, with the perennial section, particularly the middle section, being greatly affected by abstraction, noticeably so in the late 1980s and early 1990s[3] .

[1] Last B (2013). Portrait of a Parish, the Natural History of Berwick St James.
[2] *Ibid* P32. In December 1990 there was no flow at Berwick Bridge. There was no flow to the confluence of the Wylye in the summers of 1934 and 1976, two very dry years.
[3] *Ibid* P32

Appendix 2
River Avon SAC Features for Selection

Annex I habitats that are a primary reason for selection of this site

3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation

The Avon in southern England is a large, lowland river system that includes sections running through chalk and clay, with transitions between the two. Five aquatic *Ranunculus* species occur in the river system, but stream water-crowfoot *Ranunculus penicillatus* ssp. *pseudofluitans* and river water-crowfoot *R. fluitans* are the main dominants. Some winterbourne reaches, where *R. peltatus* is the dominant water-crowfoot species, are included in the SAC.

Annex II species that are a primary reason for selection of this site

1016 Desmoulin`s whorl snail **Vertigo moulinsiana**

There is an extensive population of **Desmoulin's whorl snail *Vertigo moulinsiana*** along about 20 km of the margins and associated wetlands of the Rivers Avon, Bourne and Wylye. This is one of two sites representing the species in the south-western part of its range, in chalk stream habitat. It occurs here in a separate catchment from the Kennet and Lambourn, within an environment more heavily dominated by arable agriculture.

1095 Sea lamprey **Petromyzon marinus**

The Avon represents **sea lamprey *Petromyzon marinus*** in a high-quality river in the southern part of its range. There are excellent examples of the features that the species needs for survival, including extensive areas of sand and gravel in the middle to lower reaches of the river where sea lampreys are known to spawn.

1096 Brook lamprey **Lampetra planeri**

The Avon is a high-quality river that represents the southern part of the range of **brook lamprey *Lampetra planeri***. A healthy, stable population occurs in the main river and in a number of tributaries. The main river, and in particular its tributaries, provides clean beds of gravel for spawning and extensive areas of fine silt for juveniles to burrow into.

1106 Atlantic salmon **Salmo salar**

The Avon in southern England represents a south coast chalk river supporting **Atlantic salmon *Salmo salar***. The salmon populations here are typical of a high-quality chalk stream, unaffected by the introduction of genetic stock of non-native origin. The Avon has an excellent mosaic of aquatic habitats, which include extensive areas of gravels essential for spawning and growth of juvenile fry. There has been limited modification of the river course by comparison with many other southern lowland rivers in England.

1163 Bullhead **Cottus gobio**

The Avon represents **bullhead *Cottus gobio*** in a calcareous, relatively unmodified river in the southern part of its range in England. The River Avon has a mosaic of aquatic habitats that support a diverse fish community. The bullhead is an important component of this community, particularly in the tributaries.

Source: JNCC SAC List.

JSP CONSULTANTS
(Consultants in Noise & Vibration)

2 Millards Way Upton Scudamore
Nr Warminster Wiltshire BA12 0DR

Tel: 01985 847405 Fax: 01985 847405

Mr J S Pollard BSc, C Eng, MIOA
(Member of Association of Noise Consultants)

Email: jspnoise@aol.com
Website: www.jspconsultants.co.uk

REVIEW OF THE REQUIREMENTS AND CONTENT OF THE HIGHWAYS ENGLAND TRANSPORT APPRAISAL REPORT FOR THE A303 STONEHENGE PROJECT

Prepared for

The Campaign for the Preservation Of the Southern Till Valley

Date: 28 February 2017

Report No: RPT1297

1. INTRODUCTION

This report reviews the requirements and content of the acoustic aspects of the Highways England Transport Appraisal Report (TAR) for the proposed A303 Stonehenge Amesbury to Berwick Down Public Consultation process, with particular emphasis on the location of the two bypass options for the A303 road around Winterborne Stoke. The consultation period of 7 weeks from the February 2017 release date was intended to allow time for local residents to express their views on the northern and southern routes.

The Highways England TAR document, and its associated appendices, only summarise the acoustic issues in very general terms, and attempts to obtain the detailed technical reports prepared by Arup/Atkins have been met with a release refusal, on the grounds that either the technical reports do not exist or there is no need for the general public to have access to them. Appendix 1 of this report reproduces the two emails dated 1.3.17 and 13.2.17 that were submitted to Highways England requesting this information.

Fortunately by putting pressure on the system, including a Freedom of Information Act Request, representatives from the Parish Councils of Shrewton, Winterbourne Stoke and Berwick St James were privy to a meeting with Highways England representatives on the 23rd February 2017. Whilst this meeting provided further insight and useful discussion on the project details plus a number of slides of results, it was considered that more information would be needed from Highways England before the Parish Council representatives could make informed judgement on behalf of local residents.

Those attending the meeting were shown information, but were denied the right to take such information away in the form of the Highways England PowerPoint presentation. Furthermore attendees were told that they " would be unable to interpret the slides 'in context' and that it was privileged information". At the same time attendees were encouraged to "inform the community".

Section 2 of this report covers the information normally expected to be provided for projects of this size, section 3 outlines in more detail the procedures recommended in Government documents such as the Design Manual for Roads and Bridges (DMRB) (reference 1) and section 4 covers the Calculation of Road Traffic Noise (CRTN) prediction method (reference 2). Section 5 briefly outlines the scope of the TAR document in terms of its acoustic content and section 6 discusses the results, conclusions and deficiencies from the TAR document and the February meeting and highlights some the of concerns raised by the local Parish Councils.

2. ASSESSMENT METHOD

For its assessment process, Highways England has adopted the guidance in the Department for Transport TAG Unit A3 Chapter 2 report and has used the CRTN method for calculating road traffic noise and the DMRB procedures for quantifying the predictions. According to chapter 18, the noise study area was selected to cover 600m either side of the proposed scheme for the main roads under consideration, 600m either side of other routes within 1km of the scheme where noise changes of at least 1 dB are expected in the opening year and 50m either side of existing roads where noise changes of at least 1 dB are expected in the opening year and 3dB in the longer term. 'Do something' scenario (i. e. 15 years after scheme opening) and 'do nothing' scenario (i.e. 15 years of normal traffic flow increase without the scheme changes) have both been assessed.

The traffic noise predictions have been conducted for the 2 proposed dual carriageway A303 routes and the existing single carriageway A303 route. The predictions are reported to be in line with the CRTN method, but it is unclear to what degree the detailed guidance has been followed. Acoustic mitigation measures such as barriers, earth bunds have definitely not been included, but the Highways England representatives at the February meeting implied that the predictions were based on existing topographical information only, by following existing

terrain/ground contours with 3D digitisation, but not allowing for the effect of cuttings, embankments and viaducts. This is unclear because cuttings, embankments and viaducts etc will have a significant effect on the results, but nowhere in the TAR documents are the route options defined in sufficient detail to provide the necessary inputs for the 3D digital representation.

Other known inputs to the prediction model are reception points at 4m above local ground level (i.e. first floor property level), façade locations closest to the noise source, low noise road surface corrections and no specific meteorological conditions. Soundplan is believed to be the commercial package used for the CRTN prediction process.

Somewhat surprisingly a baseline noise survey has not been conducted and the assessment has been based on predictions only. Without knowing the existing noise conditions, it is difficult to know how much emphasis can be placed on the prediction accuracy for the existing A303 route. The reason given for the lack of a baseline noise survey is that a survey is not necessary at this stage of the route option choice, but bearing in mind how long the A303 Stonehenge Improvement review has been in progress, it is difficult to believe that noise measurements have not been conducted around Winterbourne Stoke and Berwick St James in earlier years.

Noise mitigation measures normally take the form of acoustic barriers such as acoustic fences, walls and earth bunds between source and reception point, plus building sound insulation treatments, such as window glazing improvements.

The Noise Insulation Regulations 1975 specify three conditions to be met for eligibility for property sound insulation:-

a. the new traffic noise level must not be less than 68 dBA L_{10} 18 hour.

b. the new noise level must be at least 1 dBA above existing noise levels.

c. the new or altered highway is assessed to be responsible for contributing at least 1 dBA to the final noise level.

All three conditions need to be satisfied as stated in Regulation 3.

Regulation 4 extends to the highway authority the discretionary power to provide insulation where properties are adversely affected by road improvement schemes (as opposed to new roads), provided the use of the altered road causes or is expected to cause noise at a level not less than 68 dB(A). Regulation 5 extends to the highway authority the discretionary power to provide insulation where properties are affected by noise levels from the construction of the proposed road.

3. DMRB ASSESSMENT PROCEDURES.

The first stage in the DMRB procedure is to select an area of, say, ± 300m either side of the centre line of the road scheme and identify noise sensitive locations within the 300m distances. This information is normally displayed on a map with the ± 300m bands marked in 50 or 100m intervals either side of the road. Noise sensitive locations are normally defined as residential properties, places of worship, public buildings (libraries etc), schools, colleges, public open spaces, sports & leisure facilities, footpaths etc

In addition to front line rows of houses on both sides of the road, there are often second line and possibly third line rows of houses set further back with gardens in between. Consequently, although high noise levels are experienced, at the first line of houses, such houses provide very good acoustic shielding for the second and third rows such that traffic noise levels can reduce considerably in built up areas at relatively short distances from the main road. Most houses tend to be of the conventional two storey height and for a relatively

flat area, a line of housing can provide 15-20 dB attenuation depending on source and receiver distances. Any breaks in the houses, however, will result in considerably less attenuation.

In order to assist the traffic noise assessment, and satisfy DMRB requirements, ambient noise measurements are normally conducted at a number of locations along the scheme route. This baseline noise survey is important to assess the current acoustic environment and consequently normally covers a number of the previously identified noise sensitive locations close to the road and more distant locations across the ± 300m wide assessment area. Data can be acquired at free field or façade locations depending on access availability, and can include both daytime and night time visits.

The traffic noise calculation procedure (see section 4) requires noise predictions over the 18 hour period 06.00-24.00 hours, which can be based on known 18 hour traffic flows or the summation of 1 hour traffic flow noise levels. Consequently any traffic noise measurements should strictly speaking be conducted over the same 18 hour period, or the 3 hour shortened measurement procedure (3 consecutive hours between 10.00 and 17.00 hours) recommended in CRTN. In practice, however, 18 hour measurements, and to a lesser extent 3 hour measurements, can be very time consuming and costly, particularly for large study areas. Providing that a given measurement position is dominated by traffic noise, 10 or 15 minute measurement periods give a good measure of the 1 hour traffic noise levels and thus 1 hour predictions can be calibrated against the 1 hour derived measurements to determine whether the 18 hour predictions are realistic or not.

Stage 3 of the DMRB requires a noise nuisance assessment to be conducted for all properties where the noise change is 1 dB or more. Nuisance is measured as the percentage of people bothered by traffic noise and the DMRB provides two graphs based on social surveys. Figure 2 of the DMRB (not reproduced here) shows a steady state relationship between noise nuisance and noise exposure in the form of the percentage number of people bothered (very much or quite a lot) by traffic noise versus the L_{10} (18 hour) noise level. Figure 3 of the DMRB (not reproduced here) shows a relationship between changes in noise nuisance and changes in noise exposure in the form of change in percentage people bothered (very much or quite a lot) by traffic noise versus the change in L_{10} (18 hour) noise level.

The DMRB stage 3 procedure requires that the nuisance assessment should classify reception point locations according to their ambient levels in bands of below 50 dBA, 50-60 dBA, 60-70 dBA and above 70 dBA. These bands apply to the 18 hour L_{10} noise level. For each ambient band it is then necessary to state the number of properties subject to noise increases or decreases of 1<3 dBA, 3<5 dBA, 5<10 dBA, 10<15 dBA and above 15 dBA. The number of properties subject to the following increases or decreases in the percentage of people bothered by noise is then required: below 10%, 10<20%, 20<30%, 30<40%, above 40%.

4. CRTN METHOD

Traffic noise is normally measured or predicted in L_{10} units, where L_{10} is the noise level exceeded for 10% of the given time period. The information can be provided in the form of 1 hour values for any given hour of the day or night or an 18 hour value based on the average of the eighteen 1 hour values between 06.00 and 24.00 hours. Other units such as L_{eq}, L_{50}, L_{90}, L_{max} exist for other assessment requirements. For example L_{90} is used for defining the background or ambient noise level, where L_{90} is the noise level exceeded for 90% of the given time period.

The DMRB refers to the need to conduct traffic noise predictions by means of the CRTN method (reference 2). This Department of Transport method takes into account the speed and flow of the traffic, the road gradient, HGV content, source and reception point heights, perpendicular distances to noise source line etc, angles of view of each segment, plus any

barrier attenuation or ground absorption effects on route. In addition corrections are applied for road surface conditions (texture and depth), low flow conditions (below 200 vehicles per hour) and reflection effects from adjacent facades and opposite facades on route.

The two main parameters, however, are the traffic flow values (q) and the source/reception point distances (d). In the case of the former, traffic noise varies as 10log q so that a change in traffic flow from q_1 to q_2 will produce a change in noise level of 10log q2/q1. Hence a doubling of flow will give a 3 dBA increase, whilst a 25% change in flow will produce a 1 dBA change, which is why the DMRB refers to 25% flow changes and 1 dBA noise changes. In the case of the latter, traffic noise varies as 10log d so that a halving of the distance will produce a 3 dBA increase in noise. Passing vehicles are considered to be a 'line' noise source, whereas a stationary noise source will be a 'point' noise source with a 6 dBA increase for halving the distance.

Calculations can be performed for 1 hour traffic flows or 18 hour flows and whilst the DMRB procedure requires 18 hour L_{10} noise levels, single 1 hour L_{10} levels are often calculated for comparison with measurement. Normally the prediction model would be checked by applying it to the current situation with measured traffic flows and measured noise levels at selected time periods from the baseline noise survey. Any difference between measured and predicted noise levels for the current situation would then be applied to the future situation to allow for inaccuracies in the modelling process, such as road surface corrections.

5. TAR DOCUMENT AND ASSOCIATED APPENDICES

The TAR document covers a number of subject matters, but the acoustic sections are mainly contained in Chapter 10 on traffic analysis and modelling, Chapter 18 on environmental assessment and Appendix H with the noise assessment summary. The document covers a number of proposed dual carriageway route options, but it is the 2 preferred route options of D061 (northern bypass) and D062 (southern bypass), which need to be considered in this report.

Route option D061 of the new A303 goes north of Winterbourne Stoke and includes (from west to east) an approximate 5m deep cutting after the Parsonage Down area, an embankment north of Scotland Lodge farm up to 20m height to navigate the steep topography, a viaduct structure over the Till Valley, a further embankment after the River Till, crossings with the existing A303 and A360 roads, and finally a cutting near Diamond Wood.

Route option D062 of the new A303 goes south of Winterborne Stoke, but north of Berwick St James, and includes (from west to east) an embankment up to 14m height prior to the B3083 road, a viaduct of approximately 10m height over the River Till, an embankment of approximate 12 m height and subsequent cutting prior to the Oatlands Dairy Unit, an embankment up to 8m height before the A360 road junction and a final embankment up to 7m high before Diamond Wood.

Both route options are approximately 400m longer than the existing A303.

6. ASSESSMENT RESULTS AND CONCERNS

The TAR document provides very little analysis of the traffic noise predictions and it is impossible for the general public to make any informed judgements on the 2 routes. Chapter 18 appears to give the main conclusions of the study with vague statements like 'there would not be a large difference in noise effects between route options D061 and D062' and 'the majority of noise reductions for all routes would be around Winterbourne Stoke'. This last sentence is stating the obvious, since both route options are moving the A303 well away from its current route through the centre of the village.

As a result of a WebTAG assessment, the document provides further information on the number of households experiencing changes in noise levels rounded to the closest hundred

properties. This information is summarised in tables 18.1 and 18.2 of the document and shows exactly the same numbers of households experiencing increased noise or decreased noise for both route options. It is not clear whether this is a typing error or not, and gives no guidance to residents choice of route option.

Slightly more information was provided at the February meeting, by way of slides showing the predicted changes in road traffic noise at Berwick St James for the 'do minimum (nothing)' case and the proposed 2 route options. Unfortunately it was not possible to have hard copies of the slides.

The 'do minimum' case applied to the existing A303 road through Winterbourne Stoke in the year 2039 and showed the Leq noise levels in the form of coloured residential reception points in Berwick St James in bands of 3 dBA between 45 dBA and 75 dBA. The significance of this slide is difficult to ascertain without having the corresponding existing 2017 data. The route option slides showed the change in noise levels (presumably Leq units) at Berwick St James for firstly the northern bypass and secondly for the southern bypass. The graphs were in the form of coloured residential reception points in Berwick St James for 3 dBA bands between greater than -10 dBA to greater than 10 dBA.

The corresponding route option slides for the predicted noise level changes at Winterbourne Stoke were not provided, although the 'do minimum' case slide for Winterbourne Stoke properties was provided. Similarly there were no slides comparing the 2 route options on one graph for either Berwick St James or Winterbourne Stoke, although this would have been difficult to provide bearing in mind all the data on the individual slides.

The only other conclusion of interest from chapter 18 of the TAR document was the statement that less than 10 households may be likely to qualify for noise insulation with route option D061 and less than 15 households for route option D062. Obviously these households are close to the 2 route options and it should be possible to determine which properties these statements are referring to from the February meeting slides.

One of the issues raised by Berwick St James residents is the effect of wind speed and direction on the results. In line with standard practice the CRTN predictions take no account of prevailing wind conditions. Also it is standard practice for reasons of reproducible results to measure nose levels in good weather conditions of no rain and no wind or a slight breeze. ISO standard 1996 Part 2 (reference 3) recommends that wind speeds should be no more than 2m/s to 5 m/s. Two documents of interest covering the effect of wind conditions are the CONCAWE report and a technical paper by the Hayes McKenzie Partnership.

The CONCAWE report (reference 4) describes a method for predicting the propagation of noise between source and receiver over large distances for various meteorological conditions. It is based on petrochemical plant studies and provides a correction factor.

$$\Sigma \mathbf{K} = K_1 + K_2 + K_3 + K_4 + K_5 + K_6 + K_7$$

where the seven attenuation mechanisms account for geometrical spreading, atmospheric absorption, ground effects, meteorological effects, source height effects, barriers and in-plant screening.

CRTN already accounts for geometrical spreading) (K_1) and barrier attenuation (K_6) in its calculation procedure. In-plant screening (K_7) is specific to power station complexes and is not appropriate for the A303 study.

Atmospheric attenuation (K_2), due to the absorption of sound by the atmosphere, is very frequency dependent and needs to be assessed in conjunction with source noise levels in 1/3 octave frequency bands. In the absence of the latter it cannot be included in the prediction process and is not part of CRTN.

Ground attenuation effects (K_3) are also frequency dependent particularly when the ground surface is acoustically 'soft' (e.g. grass/soil). In the absence of frequency information it also

cannot be included in the prediction method and is not part of CRTN. Source height effects (K_5) are related to the ground effects and are dependent on grazing angles of incidence between source and receiver.

Finally the meteorological correction K_4 is wind and temperature dependent and a function of frequency. For soft ground the CONCAWE report provides both a frequency related calculation process and a more simplified frequency independent model.

The validity of the prediction model has been tested over the distance range 100-2000 m and wind speeds up to 7m/s and variations of up to 10 dBA have been found.

The Hayes McKenzie Partnership technical paper (reference 5) covers a study of road traffic noise measurements at 2 sites near Birmingham and Heathrow under different wind directions (northerly, easterly, southerly and westerly) for wind speeds between 0 m/s and 5 m/s. The results varied between the 2 sites due to the open countryside environment at Birmingham and the more urban environment at Heathrow and the different distances from the various roads, but in general spreads of up to 15 dBA were experienced for the Leq unit.

In summary these 2 reports show that wind speed and direction can be responsible for large variations in transmitted noise from source to receiver and this aspect is not covered in the Highways England submissions. Residents of Winterbourne Stoke are very concerned that, as prevailing winds are known to carry the noise across fairly open fields on route from the current A303 road, the southern route would be subject to increased noise levels in the village due to the dominance of winds from the south.

The other area of concern relates to the modelling approach adopted by Arup/Atkins for the various new topographical features of embankments, cuttings and viaducts. As mentioned in section 2, it is unclear what features have been built into the prediction model aside from the existing terrain changes along the current A303 road. Embankments, cuttings and viaducts are part of CRTN procedures and worked examples are given in the CRTN document. Cuttings will have reflecting walls and screening walls with the latter acting as acoustic barriers in the same manner as acoustic fences, walls or earth bunds. Embankments and viaducts will not provide any screening, unless the edge of the embankment acts as a barrier to close by reception points, or there are purpose built barriers alongside the road.

The attenuation provided by an acoustic barrier depends on the height of the barrier, the source and reception point heights and the distances between the barrier and the source and reception points. The closer the source and reception points are to the fence, the greater the attenuation obtained. For the barrier to be effective the reception point needs to be in the shadow zone of the source point. If the reception point lies in the illuminated zone of the source point, then the attenuation will be very small or zero. The attenuation of a barrier can be predicted for known source/receiver distances using standard sound ray path differences. The CRTN document shows potential barrier attenuations of up to 20 dBA for source and receiver both close to the barrier, but in practice 15 dBA maximum attenuation is a more realistic figure.

7. CONCLUDING REMARKS

A brief review of the Highways England Transport Appraisal Report and Associated Appendices has shown that the documents in their current form are hopelessly inadequate for local residents to assess the noise implications of the route options and to make an informed choice between the northern bypass and the southern bypass around the village of Winterbourne Stoke.

Email correspondence with Highways England representatives and discussions at the 23rd February 2017 meeting between Highways England staff and the Parish Councils confirm that much more information exists on the traffic noise predictions for the 2 routes than has been released to date. This information is clearly available in report form and needs to be released to interested parties.

The degree to which the CRTN method for predicting road traffic noise has been followed in its entirety is unclear. The TAR document implies that all procedures in CRTN have been followed, but the February meeting indicated that the predictions were based on existing topographical information only and did not allow for the effects of cuttings, embankments and viaducts.

Detailed information on the location and shape of these new topographical features have not been provided and neither has there been any discussion on the mitigation requirements of acoustic fences, walls and earth bunds.

Wind speed and direction issues, although not part of the CRTN prediction procedures, need to be addressed owing to the residents' concerns of prevailing wind directions.

The most important omission from the Highways England investigation is the complete lack of a detailed baseline noise survey. Such surveys are considered essentially for projects of this size and efforts should be made to determine whether surveys exist from earlier studies of the A303 Stonehenge route.

8. REFERENCES

1. *Design Manual for Roads & Bridges. Volume II Section 3 Part 7*
   Traffic Noise & Vibration. August 1994.(since updated)

2. *Calculation of Road Traffic Noise*
   Department of Transport Welsh Office 1988

3 *Description, Measurement & Assessment of Environmental Noise Part 2*
   ISO 1996-2 Second Edition 2007

4. *The Propagation of Noise from Petroleum and Petrochemical Complexes to Neighbouring Communities*
   Acoustic Technology Limited Report for CONCAWE dated May 1981

5. *The Effects of Wind Speed & Direction on Ambient & Background Noise Levels in the Suburban Environment*
   Proceedings of the Institute of Acoustics Vol 24 Pt 3 2002

APPENDIX 1

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Environmental Planning

03/03/2017

Review of A303 Winterbourne-Stoke Bypass Options

Prepared for: The Campaign for the Preservation of the Till Valley

Address: Appletree Cottage, Berwick St James, Salisbury, Wiltshire, SP3 4TX

M60065

MABBETT ENVIRONMENTAL PLANNING LTD, CORPORATE AND REGISTERED OFFICE: MABBETT HOUSE, 11 SANDYFORD PLACE, GLASGOW, U.K. G3 7NB REGISTERED IN SCOTLAND NO: SC524593
INFO@MABBETT.EU WWW.MABBETT.EU
BELFAST; CARDIFF; GLASGOW ; LIVERPOOL; ROSYTH; DUBLIN

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This report has been issued and amended as follows:

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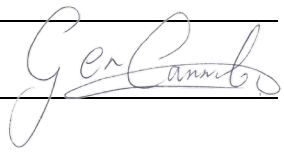
1.0	Internal Draft1	01/03/17	BW	
2.0	Draft Report to Client	01//03/17	BW	
3.0	FINAL Report	02/03/17	GC	

Executive Summary

Mabbett Environmental Planning Ltd have been commissioned by the 'Campaign for the Preservation of the Southern Till Valley' (CPSTV)[1], to undertake a critical review of the consultation and options appraisal process used by Highways England (HE) to bring forward two route options for a Winterbourne-Stoke A303 Bypass. The Bypass is required as part of a larger Scheme to develop a tunnel under Stonehenge, a World Heritage Site on the Salisbury Plain.

The CPSTV do not oppose the tunnelling beneath Stonehenge and believe in the goal of transforming the A303 into a viable strategic highway to the west of England. However, they are strongly opposed to the southern bypass of Winterbourne Stoke and in favour of the northern bypass.

The Community is concerned that the two routes have not been treated in the same way in the consultation process, and that the public (and statutory consultees) have not been informed as to the true nature of the potential impacts of the southern route.

The Study has concluded:

1 The appraisal process undertaken to compare the two bypass options is fundamentally flawed;

2 The claims by Highways England that there were 'no significant characteristics differentiating the two bypass options' are erroneous. There are significant differences between the two routes in terms of ecology, landscape, hydrogeology, noise, air quality that should have been presented to the public at this level of consultation;

3 By comparison with the northern bypass, the impacts of the southern bypass route on the River Till SAC are so severe that they cannot be mitigated, and in this report's view, given the level of supplied information, would not be consented. Legally this outweighs any concerns regarding heritage issues;

4 The southern route will cause higher noise and air quality impacts on Winterbourne Stoke than reported. Likewise, any air quality impacts on Parsonage Downs will not be significant and should not have been reported as a key issue in the reports;

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[1] *The Till Valley community have established "The Campaign for the Preservation of the Southern Till Valley" (CPSTV) to represent their views on the bypass of Winterbourne Stoke. The CPSTV represents the views of approximately 400 residents of the community south of the A303, including Winterbourne Stoke, who would be directly impacted by the southern route bypass option. This represents from 70% to 95% of the community of the three Villages (Winterbourne Stoke, Berwick St James and Stapleford) and environs. Current estimates are that at least 400 submissions will be made the Community*

5 When comparing the northern and southern bypass options, the visual impact of the southern route is likely to be higher, owing to the need for more high level structures. A formal analysis of these impacts should have been presented to the consultation process;

6 Significantly more land take will be required for both routes, but particularly for the southern route, than currently presented;

7 It can be shown that there is a distinct bias throughout the Transport Appraisal and the consultation process in favour of choosing the southern route.

8 The public have not been provided with correct or sufficient information to enable them to make an informed choice on the bypass options, and a second consultation on the bypass alternatives should be undertaken before a preferred route is announced.

Flawed Appraisal

The appraisal methodology, which is totally appropriate for high level sifting of a range of different corridor and route options, and for making the final comparison of 'tunnel' ('D' routes) vs 'not tunnel' (F route). However, this methodology should not have been used to try to distinguish the two bypass options. The main outcome of the TA process was to identify one preferred route with two alternatives. This now effectively brings the scheme into the EIA and HR process, and the difference between, 'options appraisal' vs 'assessment of alternatives' appears to have been misunderstood.

Differences between the Southern and Northern Bypass Route

Due to the refusal by Highways England to provide the Technical reports used as a basis for the options appraisal, the Community has been forced to fund the collection of its own baseline data by expanding the scope of work for this study and by engaging other specialist consultants, primarily with regard to ecology, traffic and noise.

Ecology

Studies undertaken for the purposes of this report have demonstrated that there are significant differences between the north and south bypass options, primarily due to the hydrogeological conditions and ecological quality of the River Till, which have a substantial bearing on the likely adverse impacts on its SAC objectives, the types of construction methods to be applied, the mitigation solutions required, and indeed the feasibility of the southern route as a viable option.

The footprint for the construction of the southern route viaduct is directly atop of a complex spring system and Annex I and Annex 11 habitats and species, and will permanently remove the area where up to 90% of spawning for Brown Trout occurs for the River Till and downstream.

Construction of a northern viaduct would allow over 2km separation distance from these sensitive features.

These differences are material and would have a significant influence on public perception of routes if these were published.

Given the likely failure of the southern route option to meet the Article 6.4 tests of the Habitats Directive when a better ecological option (the northern bypass route) is available, it is considered irresponsible for Highways England to proceed further without at least undertaking a screening exercise (Test of Likely Significance) for both options, in accordance with Planning Inspectorate Guidance[2], to avoid an abortive project and waste of public funds.

The information used to support these conclusions is freely accessible on public websites and easily interpreted in the hands of an experienced environmental practitioner. Therefore, there is no reason why this more detailed level of appraisal could not have been undertaken for the purposes of this consultation exercise.

Noise and Air Quality

Specialist studies indicate that if the south-west prevailing wind is taken into account. The southern route will cause higher noise and air quality impacts on Winterbourne Stoke than reported. Likewise, any air quality impacts on Parsonage Downs will not be significant and should not have been reported as a key issue in the reports.

Landscape and Visual Impact

The southern route will likely require an elevated junction over the existing embankment near the western portal, in comparison to a tunnel under the embankment for the northern route, meaning that the landscape and visual impacts of the southern route will by significantly higher than reported.

Significantly more land take will be required for both routes, but particularly for the southern route in order to address the large areas required for preventing significant the runoff of chalk slurries during the construction phase, than currently presented.

Given the importance local consultees place on the high quality of the aesthetics of the countryside, a more detailed appraisal of the comparative landscape effects should have been made available for the consultation process.

Inadequate Information

It is a conclusion of this report that there has been insufficient level of detailed technical information applied to compare the two route options. Further, it is highly suspected, given the refusal of Highways England to even provide the most easily available technical reports that this information, and being willing to accept procedural challenge under the FoIA and EIR, and censure for not doing so, that this information simply may not have been collected or applied.

Misleading Information

With regard to the SAC and impacts on the River Till, the Technical appraisal takes the precautionary principal and concludes, that due to '*the uncertainty over construction*

[2] Habitat Regulations Assessment Advice note ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects
https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2012/10/Advice-note-10-HRA.pdf

methodology, and size / footprint of one new crossing over the River Till there *will a Large Adverse Impact on the River Till (SAC)*.

However, this is contradicted within the Public Consultation Booklet, which states that

'.both crossings could be achieved without damage to the protected status of the Till'.

This statement is false and misleading with significant consequences for public perception.

Notwithstanding the current arrangements in the Infrastructure Act 2000, Highways England still has a duty as a public authority, and is answerable to the Secretary of State.

Given that:

- An early Test of Likely Significant Effects under the Habitats Regulations, on both bypass alternatives, should be undertaken as soon as possible to establish the viability of the southern route. This is to avoid abortive work on the southern option, which will be costly, result in substantial delays, and be a waste of taxpayers money;

- Further detailed assessment of alternatives will be required for the scoping stage of the EIA; The information level requirements for this are now high but can be significantly reduced if the southern route is rejected by the screening process above;

- It can be demonstrated that the public have not been provided with sufficient information to make an informed assessment in contradiction to the Aarhus Guidelines 2000;

- Highways England, in refusing a reasonable Freedom of Information Request appear to be in clear and absolute breach of the Freedom of Information Act 2000 and the Environmental Information Regulations 2014 – allowing a complaint to the Information Commissioner and higher courts;

- The public have been provided with false and misleading information, of sufficient consequence as to allow a complaint to the Advertising Standards Agency (ASA);

- Any flaws in the consultation process will be taken into account by the Local Authority and the Planning Inspectorate during Examination for the application for DCO; and

- Within the stakeholder working group commentary, Historic England, National Trust, English Heritage and Wiltshire Council have made it clear that *'considerably more than normal design and assessment information will be required to support their decision making/position at this stage in the process and this must be resolved and evaluated before the DCO is submitted' (TAR page 273).*

There is a strong argument that a correct level assessment of the bypass options be undertaken, taking into account local level issues, to address all of the above points. This should be published for a second public consultation period before any announcement of preferred route is made.

With regard to any further information submitted to address the first thee bullet points, Highways England should provide an updated website with all available information (as is now standard practice for public authorities).

The Aarhus Convention: An Implementation Guide (United Nations, New York, 2000) states that:

> *"whether coming from consultants, the proponent, co-authorities, expert bodies, or members of the public. Such reports and advice may include, inter alia, studies of alternatives, cost/benefit analyses, technical or scientific reports, and social or health impact assessments."*

According to the guidance, the obligation to make relevant information available in terms of the Aarhus Convention, article 6(2), is a continuing obligation, and [107]:

> *"… the issuance of new reports and advice to the public authority should trigger an additional obligation to notify the public concerned. The obligation to update information is also found in the lead to this subparagraph, which requires the public authorities to give all relevant information to the public concerned 'as soon as it becomes available'."*

Any announcement of the southern bypass option as a preferred route without considering the above steps, has the potential to result in significant delays to the scheme.

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Appendices

Section 1.0 Introduction

1.1 Purpose of this Report

Mabbett Environmental Planning Ltd have been commissioned by the 'Campaign for the Preservation of the Southern Till Valley' (CPSTV), to undertake a critical review of the consultation and options appraisal process used by Highways England (HE) to bring forward two route options for a Winterbourne-Stoke A303 Bypass. The Bypass is required as part of a larger Scheme to develop a tunnel under Stonehenge, a World Heritage Site on the Salisbury Plain.

The purpose of the study is:

a) to undertake an independent critical review of the consultation process and quality of information presented to the public to inform their invited preference on the route options;

b) to identify if concerns expressed by the CPSTV community are valid, and

c) to support the preparation of a consultation response from the CPSTV community to HE.

1.2 Background

The A303 Amesbury to Berwick Downs scheme one of three schemes proposed for upgrading as part of a wider A303/A358 Expressway for the South West[3].

The A303 Amesbury to Berwick Downs Scheme (Scheme 3) is intended to reduce the longstanding problem of congestion on this section of the A303, and to reduce the impact that the existing A303 has on the Stonehenge World Heritage Site. A number of options for reducing the impact on Stonehenge, including significant rerouting of the A303, or tunnelling under the Stonehenge site, have been proposed. Relief of congestion on the A303 would be achieved by increasing the road width from single to dual carriageway to provide more capacity, and moving the road away from Winterbourne Stoke. This would reduce the associated impacts on air quality, noise and severance on Winterbourne Stoke, and minimise impacts associated with increased traffic (rat running) in the adjacent villages of Shrewton, Durrington, Bulford and Larkhill.

This section of the A303 has been extensively examined on a number of previous occasions, including the option to place the A303 into a 2.1km tunnel and to build a northern bypass around Winterbourne Stoke. Many other options have been examined

[3] http://www.highways.gov.uk/roads/a303a358-work-to-create-an-expressway-to-the-south-west

at some length; many of these have been discounted for a wide variety of reasons. In 2003 a preferred route involving a northern bypass option around Winterbourne Stoke was announced, and an application, including an Environmental Impact Assessment (EIA), was submitted for public consultation and consent. However substantial objections to the preferred scheme in relation to the impacts of the Scheme on the wider archaeological setting of the Stonehenge site were upheld, and this Scheme was quashed.

A new Transport Appraisal study and report (Transport Appraisal Report (TAR)) which is currently being consulted on, has re-visited all previous feasibility studies and has reached the same conclusions as previous, namely that a tunnelling solution under Stonehenge, and a bypass around Winterbourne Stoke is the best solution. However, the main difference in the current study, is the inclusion for the first time, of a southern route bypass option being brought forward.

A comparison of the two bypass options was made using WebTAG guidance, which concluded that there were 'no significant characteristics differentiating the two bypass options'.

The public are currently being asked for their views on the current studies, including their preference for either a southern bypass option or a northern bypass option. Consultation closes on 5th March, with an announcement on the preferred route being made in Summer of 2017.

The Scheme is classed as a Nationally Significant Infrastructure Project (NSIPs) and will require a Development Consent Order (DCO) under the Planning Act 2008 before construction can start. Further consultation will be undertaken on the preferred scheme before DCO applications are submitted.

Section 2.0 Project Description

2.1 Location

The Till Valley Community ('the Community') comprises of volunteers who are residents of the Villages of Winterbourne Stoke, Berwick St James and Stapleford and other residential properties and businesses in the area, south of the A303.

The Community have established "The Campaign for the Preservation of the Southern Till Valley" (CPSTV) to represent their views on the bypass of Winterbourne Stoke. The core of the Community is the Village of Berwick St James, who have established a Village Technical Group (VTG) to coordinate all submissions and concerns. The CPSTV represents the views of approximately 400 members of the community south of the A303, including Winterbourne Stoke, who would be directly impacted by the southern route bypass option. This represents from 70% to 95% of the community of the three Villages (Winterbourne Stoke, Berwick St James and Stapleford) and environs. Current estimates are that at least 400 submissions will be made the Community.

The CPSTV do not oppose the tunnelling beneath Stonehenge and believe in the goal of transforming the A303 into a viable strategic highway to the west of England. However, they are strongly opposed to the southern bypass of Winterbourne Stoke and in favour of the northern bypass.

The Community is concerned that the two routes have not been treated in the same way in the consultation process, and that the public (and statutory consultees) have not been informed as to the true nature of the potential impacts of the southern route.

2.2 Community Concerns and Submissions

2.2.1 Key Issues

The Community is firmly of the view that:

1 the public consultation materials, as presented by Highways England is fundamentally biased towards favouring the southerly bypass route.

2 there is more highly sensitive ecology/ wildlife to the south, rather than north of Winterbourne Stoke;

3 there is protected woodland currently in the path of the southerly route;

4 that the profile, sectional views and contours of the southerly route are not accurately represented in the briefings or graphics used by Highways England; accordingly, the impact will be more obtrusive, with greater impact on the countryside, communities and aesthetic presentation;

5 that prevailing winds will expose both local wildlife and human communities to higher levels of noise and that no relevant study has been conducted to identify what this new level may be;

6 that the southerly route will result in the loss of more agricultural land than presented;

7 there will be a considerable impact caused by light pollution on local ecology;

8 that the archaeological value of area around the southern route has been ignored; there is an ancient village within the land area;

9 that the southern route will result in a significant economic loss; and

10 that the severance of these two two Norman settlement communities from one another will be permanent, leading to a breakdown of community bonds and functioning of the society so undermining the fabric of community life; sharing the churches, the footpaths and all the benefits of a close community

Section 3.0 Method

3.1 Introduction

Undertaking this study has involved the following steps:

1. A collation of publicly available data
2. Gap Analysis and requests for further information
3. Critical Review of the Technical Appraisal Report (TAR) and options appraisal process; for
    a. compliance with WebTAG and other relevant Guidance
    b. adequacy of information to inform a public consultation on bypass options.
4. Response to Community Concerns
5. Critical Review of the Consultation Process
6. Support in the preparation of a draft Consultation Response

3.2 Data Collation

3.2.1 Existing Information

All relevant documents from the HE Public Consultation website[4] were downloaded and reviewed. These are considered to be **core documents**.

Other publicly available documents were gathered and reviewed over the course of the study, these are listed in Chapter 5. References. Each document is listed with the relevant weblink.

The key government agency websites sourced included (but not limited to):

1 Legislation

a. The National Archives - www.legislation.gov.uk

- Infrastructure Act 2015

[4] Highways England Scheme 3 – Consultation website https://highwaysengland.citizenspace.com/cip/a303-stonehenge/

- Planning Act 2008 [and amendments made through the Localism Act 2011]
- Freedom of Information Act
- Environmental Information Regulations
- Conservation of Habitats and Species Regulations 2010 (S.I. 2010/490) (the “Habitats Regulations”) and amendments.
- Proposed the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

b. European Directives

- Directive 92/43/EEC (“the Habitats Directive”) and relevant Guidance.

2 GOV.UK

- 2015/2016 – 2018/2019 Road Investment Strategy (RIS1)
- A303/A30/A358 Corridor Technical Feasibility Study Reports
- Highways England License
- DfT Transport Appraisal Guidance WebTAG
- National Planning Policy Framework (NPPF)
- The Planning Inspectorate [and associated Guidance and Advisory Notes]

3 Environmental Organisations

- MAGIC – Joint Agency GIS information on the Natural Environment
- JNCC – River Avon SAC citation
- Natural England – River Till SSSI citation
- BGS – British Geological Society [Borehole Records]
- Environment Agency - Water Environment [Biodiversity | Groundwater Vulnerability | Flood Risk]

4 Other

- CIRIA – C574 [Engineering in Chalk] and PRJ PR 11 [Foundations in Chalk]
- WFD UKTAG – [Groundwater Dependent Terrestrial Ecosystems]
- Cranbourne AONB Position Statements and Management Plans

3.2.2 Gap analysis / Request for additional information

The TAR concludes that there is no significant characteristics differentiating the two bypass route options, a view that the Community disagrees with.

The environmental baseline of the northern bypass option is detailed and well known to the local communities, being the subject of multiple studies to support an EIA and concluding in an Environmental Statement (ES) in 2003. However, it is not known what level or quality of information was used to inform the TAR appraisal and conclusions for the southern bypass option.

The TAR and supporting volumes only contain summary information, however, make reference to a number of technical reports which were used to support the options appraisal studies. These documents, as well as a copy of the 2003 Environmental Statement and Technical Appendices, were requested from Highways England on 6th February 2017.

The documents requested are listed below in Table 1.

Table 1: List of Information requests to Highways England 6th February 2017

1 Background documents
   a. 2003 Environmental Statement (in full), including all Technical Appendices.

2 TAR Technical Reports (as listed in the TAR 1.4.1)
   a. Traffic Data Collection Report.
   b. Local Model Validation Report.
   c. Traffic Forecasting Report.
   d. Economic Assessment Report.
   e. Environmental Assessment Report (EAR).
   f. Appraisal Summary Tables and Supporting Worksheets Report.
   g. Initial Route Options Development – Design Fix C Environmental Report

3 Additional Information
   a. All monitoring/surveys/studies which support e), f) and g), above, including dates of any walkover surveys for BOTH bypass route options. In particular:
   - Noise reports and any monitoring information
   - Air Quality reports and any monitoring information
   - Cultural Heritage reports
   - Ecological reports/surveys
   - All landscape, ZTV's and view point studies

On the 13th February HE responded, as follows:

'the …documents requested are not being published as part of this consultation'.

The purpose of this current consultation on the A303 Stonehenge improvement is to seek the public's views on our outline proposals for the scheme at an early stage in its development. The information published is sufficient for people to understand our outline proposals, enabling views on the proposals to be expressed and for concerns and issues to be raised that we will take into consideration as part of our continuing development of the scheme.

I hope that explains the basis on which we are consulting on the scheme proposals.

The Community responded to this refusal to provide information by a) stating clearly that they believe their previous requests fall under both the Freedom of Information Act 2000 (FoIA), and the Environmental Information Regulations 2004 (EIR), and b) repeated their requests via email on 14th Feb, specifically invoking the FoIA and EIR regulations.

The Community added that a timely response to these information requests would help them avoid any request for an extension to the consultation period, however that should Highways England wish to take the full 20 days as allowed under the FOIA and EIR, or not provide the information prior to the 1st March 2017, then a strong request for an extension to the public consultation period would be made.

At the date of this report (3rd March 2017), no response has been received from Highways England.

A copy of the correspondence related to the above information requests is provided as Appendix A.

3.2.3 Additional Information

As a consequence of the above, and in the absence of relevant information, the Community has been forced to gather its own baseline data by expanding the scope of work for this study and by engaging other specialist consultants, primarily with regard to ecology, traffic and noise

Hence this report also draws on the results of three additional independent studies commissioned by the CPSTV community, namely:

1 A Preliminary Environmental Appraisal[5] (Appendix B);

[5] Ecological Planning and Research Limited (EPR) 2017. Preliminary Environmental Appraisal. A303: Winterbourne Stoke Bypass Options. Report P16/59/1A

2 Transport Engineer expert opinion on the proposed scheme[6] (Appendix C); and

3 Specialist Acoustic Study[7] (Appendix D)

The CPSTV community also includes as members, a range of qualified professionals who have also provided discussion papers on a range of topics. These have been used to support this report, where possible.

3.3 Critical Review of TAR and Supporting Documents

3.3.1 Review of 2015-2016 Roads Investment Strategy and supporting Feasibility Studies

The Secretary of State and Highways England are required under Section 3 of the Infrastructure Act 2015 to comply with a Road Investment Strategy. This document[8] and the supporting A303 Amesbury to Berwick Downs Feasibility Studies[9,10,11] were reviewed as background information.

3.3.2 Compliance with Transport Appraisal Guidance (WebTAG)

The full TAR and Volumes were reviewed to determine compliance with key DfT WebTAG documents, in particular TAG Unit 3.1 Environmental Appraisal[12].

3.3.3 Compliance with other Guidance

DRMB

WebTAG defers to the Design Manual for Roads and Bridges (DMRB) Volume 11[13] for more detailed guidance on environmental issues. This document was referred to when relevant for appropriate guidance including:

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[6] Letter Report from Mr Iain MacDonald. Vector Transport Consultancy 27th February 2017

[7] JSP Consultants (2017) Review of the Requirements and Content of the Highways England Technical Appraisal Report for the A303 Stonehenge Project

[8] Department for Transport (2015). Road Investment Strategy: 2015/16 – 2019/20 Road Period

[9] A303/A30/A358 Corridor Feasibility Study - Stage 1 Report

[10] A303/A30/A358 Corridor Feasibility Study - Stage 2 Report

[11] A303/A30/A358 Corridor Feasibility Study - Stage 3 Report

[12] TAG Unit A3 Environmental Appraisal https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/487684/TAG_unit_a3_envir_imp_app_dec_15.pdf

[13] DMRB Volume 11 http://www.standardsforhighways.co.uk/ha/standards/dmrb/vol11/index.htm

HD 44/09: Assessment of implications (of highways and/or roads projects) on European sites (including appropriate assessment)

TD 37/93: Scheme Assessment Reporting; and

HA 92/01: Scheme Development, Implementation & Management

3.4 Response to Community Concerns

The purpose of this section is to address community concerns, which predominantly relate to the perceived lack of information used to inform the options appraisal. Key issues are related to ecology, landscape and visual impacts, noise and air quality, land take, cultural heritage and economic loss.

The first step in testing these concerns would be to ascertain the quantity and quality of the background information used to support the options appraisal exercises. These would normally be found in the supporting technical documents to the appraisal.

As described in section 3.2.2 above, requests for these documents have been refused by Highways England, and therefore this level of information cannot be ascertained.

The review for this section therefore contain a summary of information collected from publicly available websites (see 3.2.1 above), local sources and the commissioned reports, to build up a comparative appraisal between the north and south bypass options.

This information has been appraised against the outcomes reported in the TAR to test if there has been a bias for the Southern bypass options.

3.5 The Consultation Process

The critical review of the consultation process has examined the consultation methods, presentation of information, and structure of the feedback form, against standard practice and compliance with relevant guidance, policy and legislation, particularly NPSNN, Guidance and Advisory Notes from the Planning Inspectorate, legal requirements (for example the Aarhus Convention[14]), and, where relevant, various case law.

Focus has been on appraising the following elements:

- Accuracy of information provided;

[14] The Aarhus Convention: an Implementation Guide (United Nations, New York, 2000)

- Adequacy of Information provided;
- Access to Information;
- Opportunities for participation and feedback;
- Fairness including;
    - Method of Feedback Analysis and Reporting
    - Evidence (or not) of bias; and
- Need for further consultation

Section 4.0 Review Comments

4.1 Road Investment Strategy

The legal basis for making decisions on Transport Schemes includes the Infrastructure Act 2015, which sets the framework for the creation of Highways England as a 'strategic highways company'.

Section 3 of the Act provides that each strategic highways company must have a Road Investment Strategy comprising a statement of the objectives to be achieved by the strategic highways company and the financial resources which will be provided by the Secretary of State to achieve those objectives. Under subsection (5), the Secretary of State must have regard to the effect of the Strategy on the environment and safety of users of the highway in setting or varying a Strategy. Subsection (6) requires the Secretary of State and the strategic highways company to comply with the Road Investment Strategy.

The current 2015/16 – 2019/20 Road Investment Strategy' (RIS 1) contains schemes developed from a range of feasibility studies conducted in 2014 over three stages following the WebTAG Transport Appraisal process. The studies for the A303 Amesbury to Berwick Downs section comprehensively reviewed all previously considered routes and options (Stage 1), and at Stage 2[15], identified that two options, 1) a northern bypass around Winterbourne Stoke, with tunnel, and 2) an Offline dual carriageway to the north of existing route between Amesbury and Berwick Down, were the better performing options against the best practice Treasury five case model (the strategic, economic, financial, management and commercial cases) [16].

These two options, (with two variations on the northern bypass option viz length of the tunnel) were further assessed for economic Value For Money (Stage 3). The second option (i.e. the offline dualling route) was dropped due to its longer length and potential adverse impacts on the setting of Stonehenge, leaving the recommended option for a (northern) bypass around Winterburne Stoke, with at least a 1.8 mile tunnel, being the approved scheme within the 2015/16 – 2019/20 Road Investment Strategy (RIS1), which was submitted to Parliament in compliance with section 3 of the Infrastructure Act 2015.

It is noted that none of the A303 options assessed (after Stage 1) in the relevant Feasibility Studies for the purposes of identifying schemes for RIS1, included a southern bypass route option around Winterbourne Stoke. In order for a southern

[15] The Stage 2 report functions as an Option Assessment Report (OAR) and an Appraisal Specification Report (ASR) as per the WebTAG Transport Appraisal Process

[16] Department of Transport. March 2015 'A303/A30/A358 Corridor Feasibility Study Summary'

bypass route option to be progressed as a preferred route, it is our opinion that a variation to RIS1 must be made.

4.2 Current TAR Corridor Appraisal Process

4.2.1 Overview

The 2016 Transport Appraisal (TA) undertaken for the purposes of the current consultation exercise effectively replicates the same stages, appraisal process and outcomes of the above 2014 feasibility studies, with the main difference being the late addition of a southern bypass option around Winterbourne Stoke.

Most of the TA is entirely directed at appraising corridor and route options with the primary objective of avoiding/minimising impact on the Stonehenge World Heritage Site (WHS). The assessment is high level, and is considered appropriate for the scale and stage of appraisal. However, due to the clear focus on Stonehenge and its high value, any discernible differences between options for other sections of the scheme are overwhelmed and drowned out by the focus on the benefits or not, on the WHS.

All corridor and route option appraisals simply refer to a 'bypass around Winterbourne Stoke', with only the very latter part of the TA process pulling out and naming the two bypass options. Even then, as with the 2014 studies, the objective of the appraisals, including the environmental appraisal, is on assessing a 'tunnel' option (routes D061 and D062 (the bypasses) vs a 'not tunnel' option (route F010)[17]. There is little in the way of a robust comparison between the Northern and Southern bypass options.

4.2.2 Level of Assessment / Adequacy of information to support inform the public consultation process

The level of assessment applied to this point in the appraisal process is sensitive to the distinct and obvious differences between the shorter 'tunnel' vs the longer 'not tunnel' options, but is too blunt to discern significant local variance between the northern and southern bypass options. As with the 2014 appraisal, the 'not tunnel' option is ruled out at this stage for a range of obvious reasons, related to the fact that the respective longer off line dualling routes would have greater environmental, monetary, traffic, severance and social impacts than the shorter 'tunnel' options, leaving the 'tunnel' option as the preferred option, with two alternative bypass routes around Winterbourne Stoke.

Unfortunately, the appraisal stops at this point, which is at the same level of appraisal (Stage 3) used to inform the 2015-2016 Road Investment Strategy (RIS1).

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[17] The 2014 feasibility study uses a northern route as the 'not tunnel' option, while the 2016 studies use a southern offline dualling route.

However, the TAR then goes on to apply the results of this level of filtering to conclude 'that there are no significant characteristics which distinguish either of the alternative bypass options'.

This procedure is considered to be flawed. At this point, the appraisal should have moved away from using the methodology of a multiple route options appraisal, to an assessment of alternatives in accordance with the proportionate level of scale, detail and information required by (including but not limited to) WebTAG Unit A3, DMRB, Planning Inspectorate Guidance, NPSNN, the Habitats Regulations and the proposed 2017 EIA regulations, all of which, in considering that the scheme is to progress to an EIA development, require particular standards and quality of information to be used when undertaking any assessment of alternatives.

Conclusions

It is the considered opinion of this report that while the multiple corridor and route options for the improvement of the A303 around the WHS have been appraised, that the alternatives for the southern and northern bypass around Winterbourne Stoke have not been undertaken at the appropriate level, and that this should have been done prior to the public consultation process. Asking communities to consult with a lack of comparative information concerning negative environmental effects will inevitably lead to an inbuilt bias supporting the option with the least information (i.e. the southern bypass route).

4.3 Response to Community Concerns

4.3.1 Introduction

The purpose of this section is to address the Community concerns, which predominantly relate to the perceived lack of information used to inform the bypass options appraisal. Key issues are related to ecology, landscape and visual impacts, noise and air quality, and land take. Objections on the basis of severance, cultural heritage and economic loss are provided in individual submissions to HE and are not addressed here.

The Community strongly disagrees with the conclusions of the TAR, given that there are obvious and influential differences in the environmental quality, sensitivity to impacts, and potential adverse environmental effects between the north and south bypass options.

While adverse impacts are emphasised for Winterbourne Stoke throughout the TAR, little or no adverse effects are reported for Berwick St James and the south, even though similar if not greater impacts are likely to occur. The Community believes that this is because the baseline environment and potential impacts of a northern bypass option are well known, in contrast to the southern route option, where little or no information has been used to support any of the conclusions of the TAR.

This lack of information and approach to reporting, if well founded, is highly prejudicial to the southern communities.

The first step in testing these concerns is to ascertain the quantity and quality of the background information used to support the options appraisal exercises. These would normally be found in the supporting technical documents to the appraisal. In accordance with WebTag Unit A3 Environmental Appraisal, these reports should also identify the limitations of any data as part of the appraisal process, the results of required sensitivity testing and any assumptions clearly stated. In the absence of information and, where appropriate, the reports should demonstrate that the 'precautionary principle' has been applied.

As described in section 3.2.2, requests for these documents have been refused by Highways England, and therefore this information cannot be ascertained.

The following sections therefore contain a summary of information collected from publicly available websites, local sources and commissioned reports, to build up a comparative appraisal between the north and south bypass options.

4.3.2 Ecology

Review Comments

This section is informed by a Preliminary Environmental Appraisal undertaken by EPR (provided as Appendix B).

The most important difference between the north and south bypass options relates to the hydro-ecology of the River Till, which is strikingly different at the proposed north and south viaduct locations. These differences have significant implications, particularly during the construction phase, with regard to ecological sensitivity to impacts, the potential need for different construction methodologies and mitigation solutions, buildability and construction timetable, and importantly, likely significant effects on the SAC and Habitats Regulations consent risk.

Hydrology/Hydrogeology

The citation for the SSSI[18] describes the complex hydrology/hydrogeology of the River system.

> *The River Till is a tributary of the River Wylye, itself part of the River Avon System SSSI. It is spring fed from the aquifer underlying the Chalk plateau of Salisbury Plain and flows through predominantly chalk geology. The upper part of the Till is a winterbourne, supported by water flowing from the aquifer in winter and early spring. As aquifer levels fall to a more stable level*

[18] https://necmsi.esdm.co.uk/PDFsForWeb/Citation/2000431.pdf

in summer, the river flows from a perennial head in the mid-section of the Till. The lower section, downstream from this, has the character of a chalk stream.

The citation therefore refers to three sections, classified into either Winterbourne (Upper section), or Chalk Stream (middle and lower sections) (see citation maps at https://designatedsites.naturalengland.org.uk/SiteUnitList.aspx?SiteCode=S2000431&SiteName=&countyCode=19&responsiblePerson=).

The northern bypass viaduct is located in the upper winterbourne section, which is mapped to extend just to the south of the A303, approx. 6km north of the confluence with the R. Wylye. This river at this point is narrow with little or no riparian habitat, and is dry for most of the year. The flood plain is dry and wide, has a low risk of flooding from surface water, and is classed as having an intermediate level of groundwater vulnerability.

The southern bypass viaduct wold be constructed in the middle section of the River Till. There is a junction of the upper and middle chalk layers in the vicinity of Berwick St James, resulting in a number of springs arising in and around the River and forming a perennial head which is thought to typically arises in a wetland to the north of the Village. This is directly within the footprint of the Southern Viaduct. In this location, the soils of the River bed abruptly change from the gravel beds typical of the upper section, to clay based alluvium, which is likely to arrest any shallow subsurface groundwater flowing from the north, contributing to the arising springs and marshy wetlands dominant in this section (see discussion on ecology below). The middle section of the River Till effectively functions as transitional zone between the upper winterbourne and the lower perennial sections. The flood plain in the vicinity of the viaduct is therefore marshy for most of the year, has a high risk of flooding from surface water, and there is classed as having a high level of groundwater vulnerability.

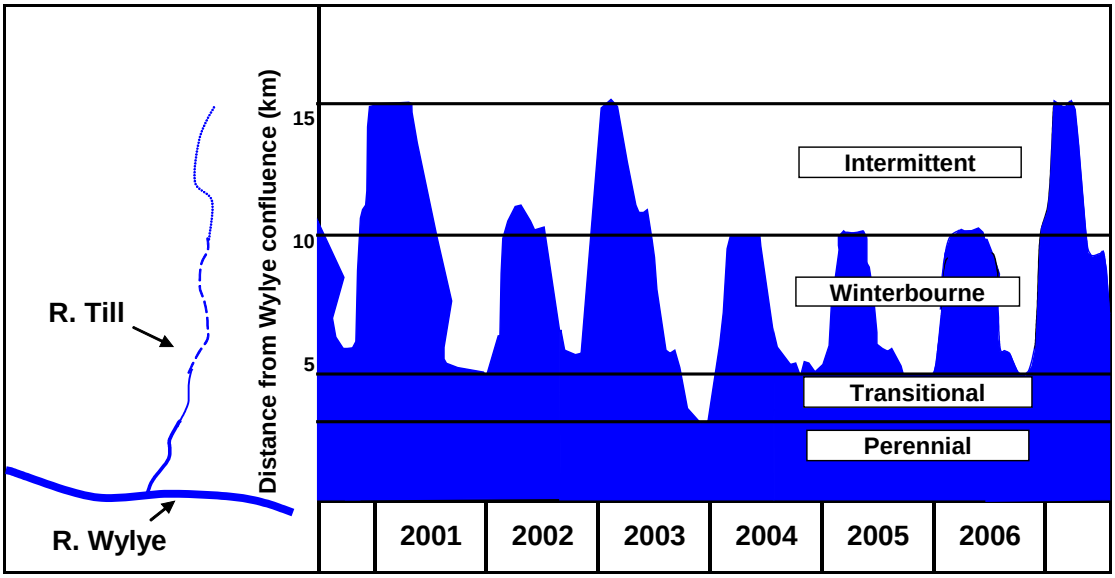
Based on local knowledge (Last, 2013)[19], the lower perennial section is considered to commence in the vicinity of Asserton House and to run approx. 3km to the confluence with the R. Wylye, and almost always contains permanent running water[20].

The winterbourne signature of the River Till is provided in Figure 1. The northern bypass viaduct is located approximately 6.5km from the R. Wylye, while the southern viaduct is located approximately 2km further downstream at 4.5km from the R. Wylye.

[19] Last B (2013). Portrait of a Parish, the Natural History of Berwick St James.

[20] *Ibid* P32. In December 1990 there was no flow at Berwick Bridge. There was no flow to the confluence of the Wylye in the summers of 1934 and 1976, two very dry years.

Figure 1 The winterbourne signature from the River Till*



*Extract from Preliminary Environmental Appraisal. EPR 2017 (Appendix B)

Due to the permeable nature of the chalk substrates, direct runoff of rainfall is negligible but sub-surface flow beneath dry valleys can be substantial. All sections of the Till are vulnerable to abstraction, and in particular are influenced by abstraction by Wessex Water which must be considered as a cumulative effect in any Habitats Regulations Assessment. The winterbourne section has been reported as being only marginally affected, with the middle transitional section, being greatly affected by Wessex Water abstraction, noticeably so in the late 1980s and early 1990s[21] .

Sensitivity

The complex hydrology/hydrogeology of the river is reflected by the different habitats and species present in each of the sections. A general description of these is provided in the River Till SSSI citation, and more detailed records are likely to be held by Natural England, and for the Wylye, also by the Biodiversity team of the Environment Agency. Additional information is available in Last, 2013, which is more formally reported within peer reviewed journals[22,23,24]. Hence these will not be repeated here, other than to highlight the following features and sensitive receptors.

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[21] Last, B (2013) P32.

[22] Last, B 2000. The Flora of Berwick St. James 1 *Journal of the Wiltshire Botanical Society* no 3:2-14

[23] Last, B 2001. Habitats of Berwick St. James 2 *Journal of the Wiltshire Botanical Society* no 4:16-21

[24] Punchard N and House A. 2009. Water and Wildlife of the Hampshire Avon Winterbournes. *British Wildlife 2009* 11-19

1 The Upper section of the Till in the vicinity of the proposed northern viaduct crossing is ephemeral and narrow, and has little or no riparian habitat (see Appendix B).

2 South of the A303 the River becomes more perennial and wider, supporting the several of the *Ranunculus* species which contribute to the SAC Annex 1 Habitat.

3 There is approx. 2km of riverine habitat (of which 1.5km is vegetated), between the northern and southern bypass viaduct options. *Ranunculus peltatus* (an Annex 1 habitat species) grows in the channel.

4 In the vicinity of the footprint of the southern viaduct, the river splits into several streamlets, which along with arising springs, forms a range of wetland types. These include the sweet grass *Glyceria* dominated grassland, reed canary-grass *Phalaris arundinacea* swamps and willow *Salix spp* Carr, which are referred to in the SSSI citation as functional parts of the river system. These also fall under the category of groundwater dependent terrestrial ecosystems (GWDTE) which are protected under the Water Framework Directive, and which are vulnerable to alterations in groundwater level[25].

5 As the flow become more consistent downstream, *Ranunculus peltatus* is replaced by brook water crowfoot *R penicillatus ssp pseudofluitans*, also an Annex 1 habitat species.

6 With regard to Annex II species, the internationally important Desmoulin's whorl snail *Vertigo moulinsiana* is recorded as occurring in tall sedge dominated vegetation in the middle reaches of the river. The snail is vulnerable to shading and alterations to groundwater levels.

7 Bullhead, Salmon and Brook Lamprey have been recorded in the transitional zone.

8 Although Brown Trout and one record of salmon, have been reported as spawning as far up as the first bends above the A303, just below the Northern Route crossing., the bulk of all spawning, including Bullhead, 90% of Brown Trout and 75% of known salmon spawnings, takes place below Winterbourne

[25] The WFD requires that groundwater bodies be classified as good or poor for chemical status (in relation to a large range of pollution pressures) and for quantitative status (in relation to groundwater abstraction pressures). The deterioration of GWDTEs is one of four tests developed for groundwater body quantitative classification, based on WFD requirements and guidance provided at an EC and UK level1 . The four tests consider the impacts of groundwater abstraction both on the groundwater body itself, and also on the ecological receptors which depend on it. The worst result from all four tests is taken as the overall quantitative status result for each groundwater body.

Stoke, between Winterbourne Stoke and Berwick St James, exactly where the Southern Route viaduct would cross the river, resulting in maximum exposure to impacts from habitat destruction and siltation.

Brown Trout is not a qualifying species for the SSSI or SAC, but is highly important for recreational fishing. The Wilton Fly Fishing Club have fished the River Till throughout the reaches between W-S and B-St-J since 1990, (leased from Druid's Lodge) and records go back to the 1880s (diaries of P M Smythe). It is a first class self sustaining wild trout fishery, as long as the fry don't get smothered in the gravel redds.

As part of the SSSI Management Agreement secured with Natural England, which led on to the SAC designation, the fishing was restored with physical enhancements over a 5 year period, ending 10 years ago.

Brief Project Description – Key Issues and Potential Effects

Both Northern and southern bypass options require the construction of a high (8-10m) viaduct over the River Till, supported by deep cuttings and high embankments on either side. Ground disturbance and the construction footprint, including construction roads for the construction of viaducts can very large.

Construction in chalk substrates is particularly challenging and requires specialist engineering techniques and expertise (see CIRIA C574 [Engineering in Chalk] and PRJ PR 11 [Foundations in Chalk]

Chalk *in situ* can be highly variable over both linear distance and depth, and is characterised by fissures and high transmissivity of groundwater. Some chalks are highly fractured, meaning that groundwater and pollutants can rapidly pass though. This also means that abstraction or dewatering may have immediate drawdown effects at significant distances from the source (ie a high zone of influence). Other chalks may be hard and have tight vertical fractures, which may be expanded/opened through drilling or piling, with a risk of developing new preferential pathways and interference with natural groundwater flow. Fine sediments in chalk slurries developed at depth due to the method of piling or drilling could also clog existing fractures used as groundwater pathways.

Once excavated, compression and/or over-handling of chalk substrates due to materials transport and handling and high construction traffic movements, have a high risk of causing chalk putty and chalk slurries to be formed, resulting in the potential for chalk fine laden milky white discharge/runoff. Exposed embankments and cuttings are susceptible to runoff for several years after the construction phase ends until stabilised and exposed surfaces are reduced by establishment of vegetation or other means. Slurries would also be generated from spoil arising from the drilling/piling operations described above.

Chalk laden discharges have fine suspended sediments which do not settle easily, and are capable of being transported significant distances by surface waters, and can potentially smother wetland habitats and spawning habitats.

Any remnants of the phosphatic chalks within spoil used for the embankments could contribute to unacceptable levels of nutrient pollution.

Pollution prevention management in chalk soild can be problematic and not without risk. Chalk fines can act to clog the bottom of infiltration/settlement ponds and swales, making them ineffective and subject to catastrophic failure unless a high maintenance schedule is put in place. Settlement basins often need to be very large to manage this risk. Clogging is also a constant problem for silt buster filtering equipment.

Intrusive Investigations for the A303. Due to the variable nature of chalk substrate over distance, a significant number of intrusive boreholes are required. BGS Borehole records show the high number of existing boreholes already drilled for the Northern bypass option. A similar number of boreholes will be required for the Southern bypass option. The boreholes in the north are typically 10m deep however, in the vicinity of the Till they are 20m deep, passing into a highly fractured chalk layer at around 6-9m in depth, after which the substrate may become hard chalk with tight vertical fractures typical of the Seaford Formation.

In addition to field testing for the geotechnical and engineering properties of chalk, boreholes drilled for intrusive investigations may also be used to determine water levels, and use test pumping to assess the degree of transmissivity by generating theoretical groundwater drawdown cones (zones of influence). This type of testing is most likely in areas where dewatering will almost certainly be required (i.e. where there are known existing high water table levels).

- **Northern Bypass Option**: As discussed above, the majority of boreholes and other intrusive investigations have already completed. However, TAR Volume 1 (p154 pars 8.12.3 and 8.12.4) states that groundwater levels were NOT recorded during previous tests, and that further Ground Investigations will be required to determine the feasibility of using infiltration as a drainage solution for the completed Scheme.

- **Southern Bypass Option:** No ground investigations have been conducted along the southern route, although it is noted that these have commenced as of the date of this letter. These are likely to be substantial and involve drilling within the boundary of the River Till SSSI/SAC.

Given that:

- The proposed testing area in the footprint of the southern option viaduct is known to have a complex hydrogeology and a high sensitivity to changes in the groundwater regime;
- 'engineering works, including drilling' (Operation 23), and Vehicle Movement (Operation 26) are listed as requiring Natural England consent for the River Till SSSI (https://necmsi.esdm.co.uk/PDFsForWeb/Consent/2000431.pdf); and
- that the majority of likely drilling and off road vehicle movement for the southern route option falls within the Impact Risk Zones for the SSSI and SAC,

the Community believes that an Intrusive Investigation Strategy should be prepared which encompasses any drilling proposed within the IRZ, and that this strategy should be subject to screening under Article 6.3 of the Habitats Directive. The Intrusive Investigation Strategy should contain full details and methodology of the works proposed, including any mitigation of spoils runoff, management of any discharges, drilling fluids etc, and that this should also consider the potential cumulative effects with the current and any proposed boreholes for the northern route option.

Piling. The method of piling is likely to be through drilling and pouring of concrete foundations, rather than percussion piling. As indicated above Seaford chalk is hard chalk with vertical fractures and drilling operations for viaduct piles will pose similar but greater risks of disturbing the arising spring systems and the fractures responsible for the perennial head in the vicinity of the southern viaduct. This risk is significantly lower in the northern option.

Depending on the density of piles, and the nature of the underlying groundwater and substrates, these also have the potential to form a variable barrier to subsurface groundwater flow.

Construction of the viaducts will involve significant areas of ground disturbance and traffic over chalky substrates. These have the potential to become sludgy and difficult to work in and dewatering may be required. This activity will also require the appropriate disposal of dewatering fluids, which will be milky white, containing high concentrations of chalk fines.

- **Northern Bypass Option**: As discussed above, the groundwater is located for most of the year beneath the surface, suggesting minimal dewatering will be

required. Due to the high transmissivity of the chalk substrate however, any dewatering operations in the north could still impact on the groundwater dependent wetlands south of the A303, and monitoring will be required. There is over 2knm separation distance between the northern bypass and these sensitive wetlands, and impacts would be significantly less than for the southern route. Any permit would likely contain conditions where dewatering could be restricted, however this would be most likely in dry periods when dewatering is less needed. Construction of a viaduct in the north would allow longer construction periods without the potential for disruption. Due to the distance between the northern viaduct and the southern wetland areas, disposal of dewatering fluids may be permissible via direct infiltration.

- **Southern Bypass Option:** By contrast, construction of a viaduct for the southern route occurs over marshy ground and wetland for all of the year, and would likely require ongoing dewatering in order to create workable surfaces for traffic. This will be difficult in an area of uprising springs and a perennial head, and extensive mitigation, including artificial recharge, sheet piles etc in order for the dewatering to be successful, will be required to avoid disturbing the immediate wetland areas. This area is sensitive to drawdown in the summer months, and any permit (should it even be granted) would likely require substantial monitoring and conditions to cease dewatering/construction should thresholds be reached. Construction of a viaduct in the south would result in a high risk of disruption to construction timetables. Due to the proximity of the wetland areas, disposal of dewatering fluids may be problematic.

Runoff

All ground disturbance, drilling and the like has the potential to generate high levels of runoff if soils become wet. This is particularly so during construction of embankments and cuttings and in winter, when all sections of the River Till are running. During the summer, chalk soils can cause significant dust problems, often managed through dust suppression methods such as water sprays, which again lead to runoff and the requirement for pollution management.

As described above, chalk runoff/slurry can clog infiltration ponds and silt busting equipment, with the high risk of failure requiring the construction of large size bunded settlement ponds, and high maintenance and monitoring effort. The risk of phosphate runoff from remnant phosphatic soils will also need to be managed Pollution / drainage management over the construction period will therefore be significantly different to drainage management during the operation of the road.

The proximity of any construction to sensitive habitats, including spawning habitats will therefore dictate the level of risk.

- **Northern Bypass Option:** The northern bypass is separated from the spawning habitats of the SAC qualifying species by 2km of vegetated buffer.

The area is flatter, and there is much more room in the northern section for the installation of large settlement ponds. The northern bypass option will have a significantly reduced risk of impacting spawning habitats in the middle and lower sections of the Till due to runoff, sedimentation and catastrophic spills.

- **Southern Bypass Option:** Runoff from proposed embankments and ground disturbance during construction of the viaduct in the southern route would run directly into Annex I and Annex II sensitive habitats and species unless managed. As discussed above, chalky slurries could smother emergent vegetation and impact spawning habitat in the immediate area, and can be transported significant distances downstream to potentially impact the R. Wylye. The southern route does not have the benefit of the 2km buffer zone that the northern route would enjoy.

Abstraction

Significant quantities of water will be required for the construction of the road, and particularly for concrete batching and dust suppression in the vicinity of the SAC.

Due to the high transmissivity of the chalk, abstraction points would need to be some distance from the River Till and will require an abstraction permit for the environment Agency, with limit conditions and requirements for monitoring. Any permit will also need to consider the cumulative impacts of abstraction with Wessex Water.

Other Environmental features

In addition to the River Till, the Valley supports a range of priority woodlands and species habitats - these are described in Last, 2013 and Appendix B. The location of the Priority Woodlands can easily be accessed on Magic and other programmes such as Google Earth or OS Maps to obtain satellite views.

Climate Change Vulnerability

The proposed amendments to the EIA Regulations, due May 16th 2017, require consideration of climate change, which in the case of transport schemes is usually restricted to calculations of Greenhouse Gas Emissions, and management of flood risk. One notable feature available on MAGIC is the mapping of Climate Change Vulnerable Habitats. All areas south of the A303 are mapped as vulnerable, with most of the northern by-pass route, particularly in the vicinity of the viaduct, as not being vulnerable.

The TAR Appraisal

The TAR makes no reference to the attributes of the River Till, the SAC or SSSI. or to the specific habitats, priority woodlands or species present in either of the bypass sections. While these may be referred to in the supporting Environmental Appraisal Report (EAR), a request for this document was refused by Highways England.

The appraisal takes the precautionary principal and concludes, that due to '*the uncertainty over construction methodology, and size / footprint of one new crossing over the River Till* there *will a Large Adverse Impact on the River Till (SAC)*.

However, this is contradicted within the Public Consultation Booklet, which states that

'..both crossings could be achieved without damage to the protected status of the Till'.

Conclusions

In contrast to the conclusion of the TAR that 'no significant characteristics differentiate the two bypass options', a review of existing environmental information has determined that there are such distinct ecological differences between the northern and southern bypass options, of such importance and magnitude, as to significantly influence the outcome of any decision on preferred bypass option.

No example more illustrates the inadequacy of the methodology which has been applied by HE at this stage of the options appraisal, more so because it has been used as a basis of a consultation exercise which asks the public (and statuary consultees) to make a decision on their preferred by-pass option.

The TAR appraisal concludes that there would be a major adverse impact on both options, triggering Article 6.3 of the Habitats Directive.

The importance of any impacts on the SAC will over-ride any other issue, by virtue of the fact that there are two alternatives being considered. Unless it can be demonstrated with high scientific certainty that there will not be a significant effect on the qualifying features of the SAC, consent could only be granted on the bypass alternative with the least ecological impact. This is the northern bypass option. Only then, can any weighting be given to heritage or other issues.

The environmental review has demonstrated the significant impacts and risks associated with construction of a southern bypass viaduct, that cannot be mitigated. The construction footprint of the southern viaduct lies directly on top of complex spring systems, wetlands, Annex I and Annex II species and habitats, and where the bulk of all spawning in the River Till occurs, 90% of Brown Trout and 75% of known salmon spawning. These do not occur in the northern section. In contrast with the northern option, efforts to try to mitigate the construction impacts in this section will be costly and problematic, and will not remove risk to any acceptable level.

By stating to the public that 'both crossings could be achieved without damage to the protected status of the Till' is false and misleading. This statement cannot be made unless at least a Habitats Regulation screening exercise has been undertaken, which would show that the southern bypass route is simply not a viable option. This has screening exercise has not been done and is considered to be a major failing of this consultation.

Any screening exercise should be undertaken prior to any announcement of a preferred option, and in accordance with recent case law, the outcomes of this screening exercise will need to go out for a second round of public consultation.

4.3.3 Noise | Air Quality

Refer Appendix D.

4.3.4 Landscape and Visual Impact | Townscape

Requests for relevant ZTVs and landscape appraisals for the southern route option, cited as supporting the options appraisals were refused by Highways England, and therefore it is not known what information was used to make comparative appraisals between the southern bypass option with the northern bypass option, where visual impact assessments will be been carried out as part of the 2003 EIA.

The following review comments are provided by a qualified Transport Engineer, who has provided expert opinion (see Appendix C).

Review Comments

The height of the embankments and the height of the viaducts over the River Till, for the north and south bypasses are not stated explicitly in the documentation published as part of the consultation. However, earlier variants D001 (north option) and D002 (south option) were described with the anticipated maximum embankment height to the west of the tunnel portal and the height of the viaduct over the River Till. It is assumed that these remain valid for the options under consideration.

When considering the visual impact of each of the options, there is a need to consider the structures which would be required as part of the mainline road requirements, and those required to connect the new road to the existing road infrastructure.

To the west of the tunnel portal, the north and south bypass options each indicate a grade separated dumbbell junction arrangement, with the connecting roads.

The northern bypass dumbbell junction location is at a section of embankment. The height of the embankment is likely to facilitate a dumbbell junction with connecting road running below the new bypass route, through the embankment. Therefore, the roundabouts and slip roads would be below the level of the new road.

Conversely, the southern bypass dumbbell junction location is at a section of the road which is also on embankment, but lower than that in the northern bypass. Consequently, it is likely that the dumbbell junction connector road for the southern option, between the roundabouts would need to pass over the new road, rather than below. Therefore, the connecting road between the roundabouts and potentially the roundabouts themselves and slip roads, would need to be on raised structures or embankment, at a level higher than the new roadway. These components have not

been included in the appraisal and presents a significantly greater landscape and visual impact for the southern route than currently assumed.

The viaduct over the River Till, for the northern option, is estimated to be 8 metres above the river, whereas, for the southern option, the viaduct would be higher at 13 metres above the river.

As such, the southern bypass, with a higher level river viaduct and high level structures at the junction with the A360, is likely to present higher levels of visual intrusion within the local landscape.

The TAR Appraisal

The TAR only considered landscape assessment and not visual impact, but concluded that bypass options Route Option D061 (northern route) has marginally less adverse impact than Route Option D062 (southern bypass options). Nevertheless, and due to the high level of assessment, Route Options D061 and D062 were assigned the same overall assessment score of Moderate Adverse (significant effect) due to very similar impacts occurring across a similar length route and the same range of landscape character areas.

With regard to visual impact, it is noted that the while zones of theoretical visibility (ZTVs) were produced, it is unclear how these were applied in the appraisal process, in particular, the location of viewpoints and identification of sensitive receptors. Given the potential increase in visual intrusion identified above for the southern route, there is the potential for a significant margin of difference between the two bypass options. ZTVs and the background information used to support the appraisal process were requested on the 6th February 2017, with this request being refused by HE.

Conclusions

It is noted that the methodology used for the landscape and townscape appraisals in the TAR considers each route option based on its engineering design and alignment. However, important details such as heights of crossing and other structures are currently not finalised, and therefore the appraisal have underestimated the potential landscape and visual impacts for the southern route in particular.

Given the significance placed on the impact on the landscape of the other proposals in this area, and the high level on concern that this type of impact will have on the residents of both Winterbourne Stoke and Berwick St James, it is disappointing that the consultation process has not been informed by a comparative visual impact assessment between the Southern and Northern bypasses. These effects will be significantly different for the two options with regards to receptors based within these two villages.

4.3.5 Land Take

The connection to the A360 proposed with the southern bypass option would require re-alignment of the A360 in the vicinity of the junction, in order to ensure the connections and structures lie outside the World Heritage Site boundary, which runs along the edge of the existing A360 alignment in this area. The connection of the new road to the existing A303 for the northern bypass option is likely to require less re-alignment and less new road construction.

There is no indication of provision for surface water runoff from the new road surfaces or for mitigation of the impact from sediment, heavy metals and hydrocarbons from road runoff. The ground water, wetlands and spawning habitat around the southern bypass route are more highly susceptible to impact from sediment, heavy metals and hydrocarbons, than the areas around the northern bypass route.

Conclusions

Both routes would require suitable mitigation against the risk of excessive environmental impact from general runoff and from runoff following an incident or spillage. However, it is likely that given the increased sensitivity of the southern bypass route and the likelihood that more new road surface will be created for the southern bypass option, more extensive mitigation measures are likely to be required. Consequently, the mitigation measures, such as settlement ponds and containment measures are likely to take up more additional land, for the southern bypass route, than for the northern bypass route.

4.4 The Consultation Process

4.4.1 Introduction

Consultation on the A303 commenced in February 2016 with the holding of several information events to seek stakeholder response.

The information contained within the publicity leaflet produced for the events was at very high level, confirming that HE was developing 3 schemes as part of the total

A survey was produced which was claimed that it would be used to help ‘shape the plans’. In addition, stakeholders could be contacted and kept informed of the progress of the scheme.

There is no evidence in the current consultation process and TA process of how any of the consultation responses have been taken into consideration.

A summary evaluation of the event and stakeholder feedback was produced[26] (undated). A total of 593 people responded to the survey, of which 298 identified they were solely interested in Scheme 3. The evaluation did not provide a full evaluation of the responses to understand what their issues and concerns were. A copy of the full evaluation response was requested from HE on the 6th of February, however this request was refused.

4.5 Adequacy of Information provided

As stated above in Section, it is considered that the current Transport Appraisal process is fundamentally flawed in the assessment of the two bypass options, and should have moved to a more detailed level of assessment before putting the conclusions out for public consultation, particularly as the public is specifically asked to give their preference on the two alternatives presented.

As it stands, the assessment concludes 'that there are no significant characteristics which distinguish either of the alternative bypass options'. This is misleading. This conclusion is reached, not because there is no difference between the bypass options, but rather, that the assessment is too blunt to discern variance at the local level. As such it does not comply with TAG Unit A3, in providing sufficient information to enable a 'robust decision' to be made at the TA level, nor for a route option which is now legally captured within the strengthened EIA process.

Studies undertaken for the purposes of this report (Section 4.3.2) have demonstrated that there are significant differences between the north and south bypass options, primarily due to the hydrogeological conditions and ecological quality of the River Till, which have a substantial bearing on the likely adverse impacts on its SAC objectives, the types of construction methods to be applied, the mitigation solutions required, and indeed the feasibility of the southern route as a viable option.

These differences are material and would have a significant influence on public perception of routes if these were published.

Given the likely failure of the southern route option to meet the Article 6.4 tests of the Habitats Directive when a better ecological option (the northern bypass route) is available, it is considered irresponsible for Highways England to proceed further without at least undertaking a screening exercise (Test of Likely Significance) for both

[26] http://assets.highways.gov.uk/roads/road-projects/A303-A358/A303+A358+Feedback+Website.pdf

options, in accordance with Planning Inspectorate Guidance[27], to avoid an abortive project and waste of public funds.

The information used to support these conclusions is freely accessible on public websites and easily interpreted in the hands of an experienced environmental practitioner. Therefore, there is no reason why this more detailed level of appraisal could not have been undertaken for the purposes of this consultation exercise.

There are circumstances in which the law insists that, **if** there is consultation by a public authority, consultation must in fairness be effective, conducted in such a manner as to afford the opportunity for informed and considered responses[28].

It is clear that the TAR produced for the current consultation process does not provide the appropriate level of information for either the public (or statutory consultees), to make an informed or considered response on their preferred alternative route.

Further discussion on the legal obligation to undertake a second consultation is provided in Section 4.4.8 below.

4.5.1 Accuracy of information provided

There are a numerous examples of non-material inaccuracies/misreporting in the TAR document which are not discussed here, however there are also a number of important areas of misreporting which have the potential to mislead the public into preferring the southern route, which could potentially prejudice the outcome against the interests of the Community.

With regard to inaccurate information, the most significant is in the traffic modelling. The following is extracted from Appendix C [full quote].

Traffic Modelling

Economic assessment was undertaken to monetise benefits of each option for comparison with the cost of each option under consideration.

For options D061 and D062, the additional journey length along the route, average journey time between the A36 and A338 and the average journey time savings, are

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[27] Habitat Regulations Assessment Advice note ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects
https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2012/10/Advice-note-10-HRA.pdf

[28] [*R* v *Secretary of State for Health* ex parte *United States Tobacco International Inc* [1992] 1 QB 353; *R (on the application of Edwards)* v *Environment Agency* [2007] Env LR 9; *Eisai Ltd* v *National Institute for Health and Clinical Excellence (NICE)* [2008] EWCA Civ 438; *R (on the application of Edwards)* v *Environment Agency (No.2)* [2008] 1 WLR 1587; *R (on the application of Moseley)* v *Haringey LBC* [2014] 1 WLR 3947 at §§ 23—25 *per* Lord Wilson, at § 36 *per* Lord Reed].

the same for both options (Table 1, p10 of the TAR). The environmental monetised benefits and scheme construction costs were deemed to be identical for both options.

For economic assessment, the sole differentiating factor between the north and south bypass options was the benefits derived using the forecast traffic model results.

The traffic model used, was developed specifically for assessment of this stage of scheme development. The model incorporated a core area broadly defined by Warminster in the West, Tidworth in the East, Salisbury in the South and Devizes in the North. Within this core, the network incorporates simulated junction modelling which ensures that junction delays vary according to the level of traffic assigned through the junctions. Outside the core simulation area, a buffer network allows traffic to assign around the simulation area and presumably facilitates alternative points of entry to the simulation area, for strategic traffic. A model of this type is suitable for estimating forecast volumes of traffic on the proposed improved options, as it will enable traffic to re-assign from other routes to take advantage of the improved journey times offered by the proposed road scheme options. The variation between the northern and southern bypass could only be the connections to the existing road network, at the A303 and A360. Other than these differences, the route length and journey times were deemed to be the same. Given the very modest differences between the north and south bypass options within the context of a relatively strategic model network, it was surprising to see the reported magnitude of difference between the options, with respect to scheme benefits.

The difference in traffic related scheme benefits between the northern and southern bypass schemes was calculated to be £85 million more benefits for the southern bypass compared with the northern bypass.

The traffic forecasts for the new road sections were presented in Tables 10-8 and 10-9 of Volume 1 of the TAR. The traffic volumes for the northern bypass scheme were higher than the southern bypass scheme, for the majority of time periods and forecast years compared. Normally, when comparing options for major road schemes, the options which attract more traffic to the new scheme, generate the greater scheme benefits. This generally holds true for modelled tests when the same demand matrix is applied to alternative scheme models, as the traffic re-assigning to the scheme under test, benefits from reduced journey times. However, in large assignment models with disaggregate demand zones, spurious benefits can be generated in remote locations, as background ‘noise’ in the model, rather than the benefits relating to the features of the scheme in question. It seems unlikely that the northern bypass scheme would attract more traffic than the southern bypass scheme yet generate lower levels of traffic related benefits. There is no information regarding the level of model assignment convergence achieved for each model run, nor regarding the principal traffic movements which derived benefits for

each option. This information would be required to check that the unexpected results are not due to model noise, rather than local traffic assignment benefits.

A further feature of the results of the traffic assignments for the northern and southern bypass schemes is the imbalance of flows over the course of the day. Roads frequently experience tidal flow over the course of a day. When the traffic volume in one direction is significantly higher than the other direction in the AM period, it would be expected to see the balance redressed and the converse true in the PM period. However, in the model results presented, the volumes over the time periods combined are consistently higher in the eastbound direction than in the westbound direction. The model is intended to represent average conditions over the course of the year. Therefore, it seems illogical that there should be a consistent imbalance of traffic in one direction. It would be expected that there be a much closer balance of traffic flows.

The final irregularity noted with the traffic model results, is the traffic volumes presented in Table 10-8, for the forecast years 2039 and 2051. The traffic volumes for each road section are identical for the AM and PM periods. Given the flow tidality, albeit imbalanced, exhibited for earlier years, it seems unlikely that exactly the same traffic assignment results would apply to each section, during different time periods in each direction. The same results could be replicated if the same demand matrix was mistakenly assigned to the model network, for both periods. i.e. if say the AM matrix was assigned to both the AM model network as well as to the PM model network. If the wrong matrix was assigned, then this would mean that the option comparisons and the scheme economic assessment would not have been made with common demand matrices for each test. This would render the tests invalid and, in addition, would explain the unexpected mis-correlation of higher scheme traffic with lower scheme benefits. If larger demand matrices were assigned to the northern bypass model than the southern bypass model, then this would lead to a mis-calculation of lower traffic related benefits for the scheme.

It is clear from the model results presented that there is further explanation of the results required and a strong possibility that mistakes have been made in the model assignments and / or background model nose in the convergence process has generated spurious and invalid benefit calculations.

Costs of the Scheme

Section 22.1.18 of the TAR states that, in regards to the scheme programme, Route Options D061 and D062 could be delivered to meet the Road Investment Strategy (RIS) programme dates and achieve a start on site by March 2020. Route Option F010 would require additional survey information leading to a 12 month delay relative to Route Options D061 and D062, and thus would achieve a later start on site date of approximately March.

This is unlikely. Little or no information has been collated for D062. For example, in orderto underpin structural integrity and buildability, significant intrusive ground investigations are required. Over 70 boreholes have been drilled in the northern route alignment, however none have commenced along the southern bypass route. Given that these investigations are costly, they are unlikely to commence before the preferred route is announced, unless of course a southern route has already been predetermined. These investigations have a significant bearing on highways structure and drainage design, which unlike the northern option which would already have finalised scheme designs which can be adapted, would need to be drawn up.

4.5.2 Access to Information

In order to do a correct and appropriate review of the options appraisal, all consultants engaged in the assessment of traffic, noise and ecology required access to the supporting technical documents. As discussed in Section 3.22, Highways England has refused to provide these documents.

In terms of Traffic, the options presented for consideration consist of two closely competing but clearly favoured options, coupled with a third choice option (F010) which is has been consistently assessed as less favoured against policy and scheme objectives.

The public are being asked to comment on a virtually finalised scheme, with limited information.

Whilst the promotor may be seeking to rely on the accuracy, impartiality and judgement of the consultants who have undertaken the scheme development and asking the public to accept the results without the need for further scrutiny, the inconsistencies in the traffic modelling results suggest that this position is not reasonable at least as far as traffic modelling work is concerned. There is a strong possibility that the traffic modelling work and the consequent economic appraisal are flawed.

The various options considered and developed were not introduced at the same time, but evolved and developed over a period of time. As such, it is not necessarily the case that the judgement used to undertake the Appraisal work and develop Appraisal Summary Tables and Environmental Assessment would have adopted a consistent approach at all times. The apparent errors in traffic forecasting and economic appraisal were to some extent masked by the means by which data was presented and the limited amount of detail available regarding model development, model calibration, assignment convergence levels and sources of calculated scheme benefits. Similarly, other aspects of the scheme development stages may contain flaws which are not evident in the data provided.

Given the relatively conclusive stage of scheme development and the relatively minor differences between the variants of the preferred route; the publication of the technical work undertaken to reach this stage is not an unreasonable expectation.

4.5.3 Opportunities for participation and feedback

It is noted that the opportunity to make submissions and provide supporting documents by email was clearly not permitted by the consultation process. The only way to provide comments on line was to fill out the simple feedback form.

Although an email address was provided, emailed attachments or supporting documents and reports have not, to date, been acknowledged as submissions. Reassurances were given in meetings that the email address could be used but there is no mechanism acknowledging receipt of submissions within the emailed format.

The public were not encouraged to ask questions. Accessibility to relevant staff was difficult. The telephone number provided was to a call centre which took messages and redirected to relevant departments. All advised that responses could take up to 15 days. Likewise emails were not responded to promptly, but again taking up to a week to obtain a response.

4.5.4 Fairness

Method of Feedback Analysis and Reporting

The feedback form/questionnaire is fundamentally flawed, particularly due to the concern that information provided is being used to determine the important question of public weight of opinion, and that would be evaluated in the simplistic way as the February 2016 consultation exercise. Key concerns are

a. There is no requirement to identify location of respondent – this means that even people who live outside the area (and the UK) could respond and it would be given the same weight as a local resident who is directly impacted by the proposals. However it is fully possible to request that respondents even mandatorily identify closest village. Further, that parts of the TAR options appraisal for the Corridor F routes recognise three distinct sections (Western, Central and Eastern), in which case this should be extended to the D routes, and that the questionnaire should also ask which of the sections they are most interested in.

b. If HE (and SoS) are just relying on numbers for and against each of the bypass options, this is decidedly an automatic bias in terms of a numbers game. There are clearly more people living in the north and which would benefit from a bypass (eg Winterbourne Stoke (250); Shrewton (1,874)..and the other villages (Larkhill and Duddington), than in Berwick St James (142) and Stapleford (264). Amesbury currently has a population of 10,724. Note numbers based on 2011 census. If only taking into account WS and Sh responses, then if only 50% of BStJ responded (71) pro the northern route, then this is equivalent to 562 submissions in the north pro the southern route. There is no way that the current questionnaire can draw out the % of respondents from each area.

Evidence (or not) of bias

Notwithstanding that the TAR report concludes that there is no discernible difference between the two bypass options, it is clear that the assessment is centred on Winterbourne Stoke, and that the comparison of the options are effectively about 'most benefit' vs 'least benefit' to Winterbourne Stoke and the northern villages.

There is discussion of some of the adverse impacts of the northern route, but little appraisal or information provided on the likely adverse impacts of the southern route, particularly on Berwick St James.

It is noted that two potential corridor options (E and F) were assessed containing elements of the southern route. Corridor E specifically identified potential traffic related impacts of noise and air quality on Berwick St James. None of these potential impacts were mentioned again or appear to be considered in any of the southern route options progressing through the appraisal process (ie Corridor F route options, nor the amended Corridor D route options.

Errors in the traffic modelling have resulted in a negative bias against the southern route.

Other inconsistencies are noted throughout the document, too numerous to recount here.

4.5.5 Need for further consultation

Given that:

- An early test of Likely Significant Effects on both bypass alternatives should be undertaken to avoid further abortive work on the southern option, which will be costly and a waste of taxpayers money;
- Further assessment of alternatives will be required for the scoping stage of the EIA;
- Within the stakeholder working group commentary, Historic England, National Trust, English Heritage and Wiltshire Council have made it clear that *'considerably more than normal design and assessment information will be required to support their decision making/position at this stage in the process and this must be resolved and evaluated before the DCO is submitted' (TAR page 273).*
- It can be demonstrated that the public have not been provided with sufficient information to make an informed assessment – allowing a JR challenge under the Aarhus Guidelines 2000;

- Highways England are in clear and absolute breach of the Freedom of Information Act 2000 and the Environmental Information Regulations 2014 – allowing a complaint to the Information Commissioner and higher courts;

- The public have been provided with false and misleading information, of sufficient consequence as to allow a complaint to the Advertising Standards Agency (ASA);

- Any flaws in the consultation process will be taken into account by the Local Authority and the Planning Inspectorate during Examination for the application for DCO.

There is a strong argument for a second public consultation period before any announcement of preferred route is made.

With regard to any further information submitted to address the first thee bullet points, Highways England breaches best practice by not providing an updated website with all available information (as is now standard practice for public authorities).

The Aarhus Convention: An Implementation Guide (United Nations, New York, 2000) states that:

> *"whether coming from consultants, the proponent, co-authorities, expert bodies, or members of the public. Such reports and advice may include, inter alia, studies of alternatives, cost/benefit analyses, technical or scientific reports, and social or health impact assessments."*

According to the guidance, the obligation to make relevant information available in terms of the Aarhus Convention, article 6(2), is a continuing obligation, and [107]:

> *"… the issuance of new reports and advice to the public authority should trigger an additional obligation to notify the public concerned. The obligation to update information is also found in the lead to this subparagraph, which requires the public authorities to give all relevant information to the public concerned 'as soon as it becomes available'."*

Section 5.0 Conclusions

It is well recognised and stated that both north and south bypass options will overwhelmingly benefit Winterbourne Stoke, Shrewton, Larkhill and Durrington. These benefits will occur no matter what route is selected and this was the original objective of the scheme. The northern bypass around Winterbourne Stoke has been well known and accepted by the community for over a decade and there has been a high level of acceptance of this route. The late introduction of a southern bypass option however, moves away from this 'win-win' situation, to a significant negative, by causing disruption impacts on another Village, when there is no apparent need to do so.

Options Appraisal Methodology

The appraisal approach appears to use the benefit to Winterbourne Stoke as a baseline, and in most cases any comparison is essentially 'most benefit' vs 'least benefit' to Winterbourne Stoke. Any potential adverse impacts to BStJ and the population to the south are only described in generic terms, and are cancelled out by the weight of 'benefits' to Winterbourne Stoke.

This is a function of the appraisal methodology, which is appropriate for high level sifting of a range of different corridor and route options, and for making the final comparison of 'tunnel' ('D' routes) vs 'not tunnel' (F route). However this methodology should not have been used to try to distinguish the two bypass options. The main outcome of the TA process was to identify one preferred route with two alternatives - This now effectively brings the scheme into the EIA and HR process, and the difference between, 'options appraisal' vs 'assessment of alternatives' appear to have been misunderstood.

WebTag requires the appraisal tools and methodology to be used proportionately – the outcome of the appraisal process should have been clear that this principal was not applied. Much was made about the guidance advising on providing too much information, in this case not enough was used.

WebTag defers to DMRB for environmental matters. DMRB recommends that both alternatives are assessed in detail for the Scoping Report, a requirement which is now strengthened by the 2017 EIA regulations.

Hence it is the conclusion of this report that there has been insufficient level of detailed technical information applied to compare the two route options. Further, it is highly suspected, given the refusal of Highways England to even provide the most easily available technical reports, and being willing to accept procedural challenge under the FoIA and EIR, and censure for not doing so, that this information simply hasn't been collected or applied.

The process is further flawed by then placing a high reliance on public route preference/ 'weight of public feeling' /quality of submissions at this stage in the process - the public do not have the correct level and quality of information available to make an informed decision thereby breaching all standards for effective public consultation.

Hence there is strong position for demanding that a second public consultation exercise occur once this information is collected, and prior to any decision on preferred option.

The main points presented in this study are:

1 The appraisal process undertaken to compare the two bypass options is fundamentally flawed;

2 The claims by Highways England that there were 'no significant characteristics differentiating the two bypass options' are erroneous. There are significant differences between the two routes in terms of ecology, landscape, hydrogeology, noise, air quality that should have been presented to the public at this level of consultation;

3 By comparison with the northern bypass, the impacts of the southern bypass route on the River Till SAC are so severe that they cannot be mitigated, and in this report's view, given the level of supplied information, would not be consented. Legally this outweighs any concerns regarding heritage issues;

4 The southern route will cause higher noise and air quality impacts on Winterbourne Stoke than reported. Likewise, any air quality impacts on Parsonage Downs will not be significant and should not have been reported as a key issue in the reports;

5 When comparing the northern and southern bypass options, the visual impact of the southern route is likely to be higher, owing to the need for more high level structures. A formal analysis of these impacts should have been presented to the consultation process;

6 Significantly more land take will be required for both routes, but particularly for the southern route, than currently presented;

7 It can be shown that there is a distinct bias throughout the Transport Appraisal and the consultation process in favour of choosing the southern route.

The public have not been provided with correct or sufficient information to enable them to make an informed choice on the bypass options, and a second consultation on the bypass alternatives should be undertaken before a preferred route is announced

Section 6.0 References

By Footnote Reference

2. Habitat Regulations Assessment Advice note ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2012/10/Advice-note-10-HRA.pdf

3. http://www.highways.gov.uk/roads/a303a358-work-to-create-an-expressway-to-the-south-west

4. Highways England Scheme 3 – Consultation website https://highwaysengland.citizenspace.com/cip/a303-stonehenge/

5. Ecological Planning and Research Limited (EPR) 2017. Preliminary Environmental Appraisal. A303: Winterbourne Stoke Bypass Options. Report P16/59/1A

6. Letter Report from Mr Iain MacDonald. Vector Transport Consultancy 27th February 2017

7. JSP Consultants (2017) Review of the Requirements and Content of the Highways England Technical Appraisal Report for the A303 Stonehenge Project

8. Department for Transport (2015). Road Investment Strategy: 2015/16 – 2019/20 Road Period

9. A303/A30/A358 Corridor Feasibility Study - Stage 1 Report

10. A303/A30/A358 Corridor Feasibility Study - Stage 2 Report

11. A303/A30/A358 Corridor Feasibility Study - Stage 3 Report

12. TAG Unit A3 Environmental Appraisal https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/487684/TAG_unit_a3_envir_imp_app_dec_15.pdf

13. DMRB Volume 11 http://www.standardsforhighways.co.uk/ha/standards/dmrb/vol11/index.htm

14. The Aarhus Convention: an Implementation Guide (United Nations, New York, 2000)

15. The Stage 2 report functions as an Option Assessment Report (OAR) and an Appraisal Specification Report (ASR) as per the WebTAG Transport Appraisal Process

16. Department of Transport. March 2015 'A303/A30/A358 Corridor Feasibility Study Summary'

17. The 2014 feasibility study uses a northern route as the 'not tunnel' option, while the 2016 studies use a southern offline dualling route.

18. https://necmsi.esdm.co.uk/PDFsForWeb/Citation/2000431.pdf

19. Last B (2013). Portrait of a Parish, the Natural History of Berwick St James.

20. Ibid P32. In December 1990 there was no flow at Berwick Bridge. There was no flow to the confluence of the Wylye in the summers of 1934 and 1976, two very dry years.

21. Last, B (2013) P32.

22. Last, B 2000. The Flora of Berwick St. James 1 Journal of the Wiltshire Botanical Society no 3:2-14

23. Last, B 2001. Habitats of Berwick St. James 2 Journal of the Wiltshire Botanical Society no 4:16-21

24. Punchard N and House A. 2009. Water and Wildlife of the Hampshire Avon Winterbournes. British Wildlife 2009 11-19

25. http://assets.highways.gov.uk/roads/road-projects/A303-A358/A303+A358+Feedback+Website.pdf

27. Habitat Regulations Assessment Advice note ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects

28. https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2012/10/Advice-note-10-HRA.pdf

29. [R v Secretary of State for Health ex parte United States Tobacco International Inc [1992] 1 QB 353; R (on the application of Edwards) v Environment Agency [2007] Env LR 9; Eisai Ltd v National Institute for Health and Clinical Excellence (NICE) [2008] EWCA Civ 438; R (on the application of Edwards) v Environment Agency (No.2) [2008] 1 WLR 1587; R (on the application of Moseley) v Haringey LBC [2014] 1 WLR 3947 at §§ 23—25 per Lord Wilson, at § 36 per Lord Reed].

Vector Transport Consultancy
1 Charlesfield Lane
Livingston
West Lothian, EH54 7FA
01506 237020
enquiries@vector-consultancy.co.uk

Contact: Iain MacDonald
Email: iain.macdonald@vector-consultancy.co.uk
Direct Dial 01506 680097

Our Ref: P1707

Date: 27th February 2017

Freepost A303 STONEHENGE CONSULTATION

Dear Sirs

A303 Stonehenge Consultation Feedback

My name is Iain MacDonald and I am a Director of Vector Transport Consultancy with 28 years experience as a Transport Consultant, including development and appraisal of major infrastructure schemes such as the proposed A303 scheme.

I have been asked to review the proposals for the A303 Amesbury to Berwick Downs Scheme, currently presented for public consultation.

It is clear from the earlier stages of appraisal and the options presented for public consultation, that the two bypass options around Winterbourne Stoke, which include the tunnel under the World Heritage Site are the favoured variants for consideration. I have focused my review on these two options and focused on the relative merits of the Northern Bypass (D061) and the Southern Bypass (D062) as reported in the Traffic Appraisal Report (TAR) and supporting volumes, and provided via the public consultation website.

The height of the embankments and the height of the viaducts over the River Till, for the north and south bypasses are not stated explicitly in the documentation published as part of the consultation. However, earlier variants D001 (north option) and D002 (south option) were described with the anticipated maximum embankment height to the west of the tunnel portal and the height of the viaduct over the River Till. It is assumed that these remain valid for the options under consideration. The drawings in Appendix F of the consultation documentation provide some indication of the width of cuttings and embankments required for each of the road alignments, together with chainage lengths. The video montage which provide a 'fly through' view of the north and south bypass routes, appear to exaggerate the widths of cuttings and embankments (relative to the width of the road), compared with those presented in the drawings. Consequently, the video montage may provide a misleading impression of the visual impact of embankments.

When considering visual impact of each of the options, we need to consider the structures which would be required, as part of the mainline road requirements and those required to connect the new road to the existing road infrastructure.

To the west of the tunnel portal, the north and south bypass options each indicate a grade separated dumbbell junction arrangement, with the connecting roads. For the northern option, the dumbbell junction would connect to the existing A303, providing direct connection to Winterbourne Stoke village and connection to the A360. For the southern bypass option, the dumbbell junction would connect to a re-aligned A360.
The northern bypass dumbbell junction location is at a section of embankment. The height of the embankment is likely to facilitate a dumbbell junction with connecting road running below the new bypass route, through the embankment. Therefore, the roundabouts and slip roads would be below the level of the new road. Conversely, the southern bypass dumbbell junction

location is at a section of the road which is also on embankment, but lower than that in the northern bypass. Consequently, it is likely that the dumbbell junction connector road for the southern option, between the roundabouts would need to pass over the new road, rather than below. Therefore, the connecting road between the roundabouts and potentially the roundabouts themselves and slip roads, would need to be on raised structures or embankment, at a level higher than the new roadway.

The viaduct over the River Till, for the northern option, is estimated to be 8 metres above the river, whereas, for the southern option, the viaduct would be higher at 13 metres above the river.

When considering visual impact of the two competing proposals, we need to consider the potential mitigation to be offered with sympathetic planting by the roadways. The sections in cutting are likely to lead to the lowest levels of visual intrusion. Sections on embankment will lead to higher levels of visual intrusion, with the potential for some mitigation through planting. The presence of above ground structures are likely to present the highest levels of visual intrusion, with the least opportunity for mitigation through planting. As such, the southern bypass, with a higher level river viaduct and high level structures at the junction with the A360, is likely to present higher levels of visual intrusion within the local landscape.

The connection to the A360 proposed with the southern bypass option would require re-alignment of the A360 in the vicinity of the junction, in order to ensure the connections and structures lie outside the World Heritage Site boundary, which runs along the edge of the existing A360 alignment in this area. The connection of the new road to the existing A303 for the northern bypass option is likely to require less re-alignment and less new road construction.

There is no indication of provision for surface water runoff from the new road surfaces or for mitigation of the impact from sediment, heavy metals and hydrocarbons from road runoff. I have been informed that the ground water and wetlands around the southern bypass route are more highly susceptible to impact from sediment, heavy metals and hydrocarbons, than the areas around the northern bypass route. Both routes would require suitable mitigation against the risk of excessive environmental impact from general runoff and from runoff following an incident or spillage. However, it is likely that given the increased sensitivity of the southern bypass route and the likelihood that more new road surface will be created for the southern bypass option, more extensive mitigation measures are likely to be required. Consequently, the mitigation measures, such as settlement ponds and containment measures are likely to take up more additional land, for the southern bypass route, than for the northern bypass route.

Economic assessment was undertaken to monetise benefits of each option for comparison with the cost of each option under consideration.

For options D061 and D062, the additional journey length along the route, average journey time between the A36 and A338 and the average journey time savings, are the same for both options (Table 1, p10 of the TAR). The environmental monetised benefits and scheme construction costs were deemed to be identical for both options.
For economic assessment, the sole differentiating factor between the north and south bypass options was the benefits derived using the forecast traffic model results.

The traffic model used, was developed specifically for assessment of this stage of scheme development. The model incorporated a core area broadly defined by Warminster in the West, Tidworth in the East, Salisbury in the South and Devizes in the North. Within this core, the network incorporates simulated junction modelling which ensures that junction delays vary

according to the level of traffic assigned through the junctions. Outside the core simulation area, a buffer network allows traffic to assign around the simulation area and presumably facilitates alternative points of entry to the simulation area, for strategic traffic. A model of this type is suitable for estimating forecast volumes of traffic on the proposed improved options, as it will enable traffic to re-assign from other routes to take advantage of the improved journey times offered by the proposed road scheme options.

The variation between the northern and southern bypass could only be the connections to the existing road network, at the A303 and A360. Other than these differences, the route length and journey times were deemed to be the same. Given the very modest differences between the north and south bypass options within the context of a relatively strategic model network, it was surprising to see the reported magnitude of difference between the options, with respect to scheme benefits.

The difference in traffic related scheme benefits between the northern and southern bypass schemes was calculated to be £85 million more benefits for the southern bypass compared with the northern bypass.

The traffic forecasts for the new road sections were presented in Tables 10-8 and 10-9 of Volume 1 of the TAR. The traffic volumes for the northern bypass scheme were higher than the southern bypass scheme, for the majority of time periods and forecast years compared.

Normally, when comparing options for major road schemes, the options which attract more traffic to the new scheme, generate the greater scheme benefits. This generally holds true for modelled tests when the same demand matrix is applied to alternative scheme models, as the traffic re-assigning to the scheme under test, benefits from reduced journey times. However, in large assignment models with disaggregate demand zones, spurious benefits can be generated in remote locations, as background 'noise' in the model, rather than the benefits relating to the features of the scheme in question. It seems unlikely that the northern bypass scheme would attract more traffic than the southern bypass scheme yet generate lower levels of traffic related benefits.

There is no information regarding the level of model assignment convergence achieved for each model run, nor regarding the principal traffic movements which derived benefits for each option. This information would be required to check that the unexpected results are not due to model noise, rather than local traffic assignment benefits.

A further feature of the results of the traffic assignments for the northern and southern bypass schemes is the imbalance of flows over the course of the day. Roads frequently experience tidal flow over the course of a day. When the traffic volume in one direction is significantly higher than the other direction in the AM period, we would expect to see the balance redressed and the converse true in the PM period. However, in the model results presented, the volumes over the time periods combined are consistently higher in the eastbound direction than in the westbound direction. The model is intended to represent average conditions over the course of the year. Therefore, it seems illogical that there should be a consistent imbalance of traffic in one direction. We would expect a much closer balance of traffic flows.

The final irregularity noted with the traffic model results, is the traffic volumes presented in Table 10-8, for the forecast years 2039 and 2051. The traffic volumes for each road section are identical for the AM and PM periods. Given the flow tidality, albeit imbalanced, exhibited for earlier years, it seems unlikely that exactly the same traffic assignment results would apply to each section, during different time periods in each direction. The same results could be replicated if the same demand matrix was mistakenly assigned to the model network, for both

periods. i.e. if say the AM matrix was assigned to the AM model network as well as to the PM model network. If the wrong matrix was assigned, then this would mean that the option comparisons and the scheme economic assessment would not have been made with common demand matrices for each test. This would render the tests invalid and, in addition, would explain the unexpected mis-correlation of higher scheme traffic with lower scheme benefits.

If larger demand matrices were assigned to the northern bypass model than the southern bypass model, then this would lead to a mis-calculation of lower traffic related benefits for the scheme.

It is clear from the model results presented that there is further explanation of the results required and a strong possibility that mistakes have been made in the model assignments and / or background model nose in the convergence process has generated spurious and invalid benefit calculations.

Whilst the material presented for consultation provides extensive coverage of the stages undertaken for identifying and sifting corridor and route options, the results are presented at a high level. The background reports which support the decision making process would provide further useful detail.

The options presented for consideration consist of two closely competing but clearly favoured options, coupled with a third choice option (F010) which is has been consistently assessed as less favoured against policy and scheme objectives.

Given the very short list of options under consideration, it seems inconsistent that the data behind the assessments made, is not available to the public who are being asked to comment on the favoured options.

The public are being asked to comment on a virtually finalised scheme, with limited information.
Whilst the promotor may be seeking to rely on the accuracy, impartiality and judgement of the consultants who have undertaken the scheme development and asking the public to accept the results without the need for further scrutiny, the inconsistencies in the traffic modelling results suggest that this position is not reasonable at least as far as traffic modelling work is concerned. There is a strong possibility that the traffic modelling work and the consequent economic appraisal are flawed.

The various options considered and developed were not introduced at the same time, but evolved and developed over a period of time. As such, it is not necessarily the case that the judgement used to undertake the Appraisal work and develop Appraisal Summary Tables and Environmental Assessment would have adopted a consistent approach at all times. The apparent errors in traffic forecasting and economic appraisal were to some extent masked by the means by which data was presented and the limited amount of detail available regarding model development, model calibration, assignment convergence levels and sources of calculated scheme benefits. Similarly, other aspects of the scheme development stages may contain flaws which are not evident in the data provided.

I believe that given the relatively conclusive stage of scheme development and the relatively minor differences between the variants of the preferred route; the publication of the technical work undertaken to reach this stage is not an unreasonable expectation.

I believe the following documents should be made publically available on a suitable scheme information web site:

a. Traffic Data Collection Report.
b. Local Model Validation Report.
c. Traffic Forecasting Report.
d. Economic Assessment Report.
e. Environmental Assessment Report (EAR).
f. Appraisal Summary Tables and Supporting Worksheets Report.
g. Initial Route Options Development – Design Fix C Environmental Report

In conclusion:
When comparing the northern and southern bypass options, the visual impact of the southern route is likely to be higher, owing to the need for more high level structures.

The southern bypass route would be likely to require more surface water runoff mitigation measures and greater land take for new road surface and new surface water runoff containment and treatment measures.

The northern bypass route ostensibly attracts more traffic and hence better fulfils one of the scheme objectives, by attracting traffic from less suitable roads (one presumes, given the limited information available) and hence provides traffic relief benefits to local communities.

This conclusion is only valid if we can rely on the traffic modelling. However, the accuracy and reliability of the traffic model results must be called into question given the inconsistency between higher scheme traffic and lower scheme benefits for the northern bypass option.
The traffic model results are suspect and further investigation, including publication of the detailed model outputs, should be undertaken before any further conclusions are reached.

Yours sincerely.

Iain MacDonald
Director

Tisbury Parish Council

Response ID ANON-BABJ-X38R-4

Submitted to **A303 Stonehenge**
Submitted on **2017-03-04 16:51:03**

Introduction

Name

Name:
Tisbury Parish Council

Postcode

Postcode:
SP3 6LD

Email

Email address:
tisburypc@gmail.com

Postal address

Address:
The Reading Room
High Street
TISBURY, Wiltshire
SP3 6LD

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Tisbury Parish Council

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
The tunnel should be extended to ensure that the 2 ends are outside the World Heritage Site.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
The eastern portal should be further east to ensure that it does not lie within the World Heritage Site.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
The western portal should be further west to ensure that it does not lie within the World Heritage Site.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
If money is available for a potential flyover, this could be better used to extend the tunnel to allow for portals outside the World Heritage Site.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Word-of-mouth

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Parish Councils, not necessarily affected by the finished scheme but affected during the construction period, were not consulted as a matter of course.

Wiltshire Council

From:	Christopher Jones <cjatob@gmail.com>
Sent:	24 March 2017 13:00
To:	Lambert, Rachel
Subject:	Fwd: Wiltshire Council Response to Highways England A303 Amesbury to Berwick Down Public Consultation
Attachments:	FINAL A303 Amesbury to Berwick Down Road Scheme.pdf; Enc. 1 for A303 Amesbury to Berwick Down Road Scheme.pdf

Rachel - to add to the database please.

Thanks,

Chris

Chris Jones
AAJV Stakeholder Engagement Lead
A303 Stonehenge: Amesbury to Berwick Down

The Hub, 500 Park Ave, Aztec West, Bristol, BS32 4RZ
Email: cjatob@gmail.com
Mob: 07729 065764

Begin forwarded message:

From: "Parody, Derek" <Derek.Parody@highwaysengland.co.uk>
Subject: Fwd: Wiltshire Council Response to Highways England A303 Amesbury to Berwick Down Public Consultation
Date: 24 March 2017 at 12:55:35 GMT
To: Christopher Jones <cjatob@gmail.com>, A303Stonehenge <A303Stonehenge@highwaysengland.co.uk>

For our records

Regards
Derek

-------- Original message --------
From: "Jones, Karen" <Karen.Jones@wiltshire.gov.uk>
Date: 24/03/2017 10:15 (GMT+00:00)
To: "Parody, Derek" <Derek.Parody@highwaysengland.co.uk>
Cc: "Khansari, Parvis" <Parvis.Khansari@wiltshire.gov.uk>
Subject: Wiltshire Council Response to Highways England A303 Amesbury to Berwick Down Public Consultation

Dear Derek,

Please find attached Wiltshire Council's response to the public consultation for the A303 Amesbury to Berwick Down road scheme conducted by Highways England between 12th January and 5th March 2017.

Please note that two changes were made to the report following discussion at our Cabinet meeting on 14th March so these differ from the previous versions sent to you for information.

If you are interested in watching the discussion at Cabinet and the various representations made by local Councillors and members of the public, the item starts at timecode 041:18 using the link below:

https://wiltshire.public-i.tv/core/portal/webcast_interactive/277071/start_time/0

If you or your team have any questions relating to our response or would like further information on any of the issues identified, please do not hesitate to contact us.

Kind Regards,
Karen

Karen Jones
Business Analyst

Please note that I do not work Wednesday's

Programme Office | Wiltshire Council | County Hall | Trowbridge | BA14 8JN

T: 01225 713956 | E: karen.jones@wiltshire.gov.uk | www.wiltshire.gov.uk

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Wiltshire Council

Cabinet

14 March 2017

Subject: **A303 Amesbury to Berwick Down Road Scheme**

Cabinet Member: Cllr Fleur de Rhé-Philipe

Key Decision: **Yes**

Executive Summary

The single carriageway section of A303 between Amesbury and Berwick Down can no longer accommodate the traffic at peak hours. This has an adverse impact on safety, local economy, local communities, and the World Heritage Site (WHS). The Council has been encouraging government to improve this road, and therefore now welcomes the proposal from Highways England to bring substantial improvements to A303 by building a dual carriageway and a tunnel.

Following a three stage options appraisal of the approximately 60 historic routes for the dualling of the Amesbury to Berwick Down section of the A303, Highways England have identified two routes as the better performing and more deliverable options for this road improvement scheme. These are:

- Route option D061 – 2.9km length tunnel with route running north of Winterbourne Stoke, the eastern tunnel portal located east of The Avenue and the western tunnel portal located west of Normanton Gorse
- Route option D062 – 2.9km length tunnel with route running south of Winterbourne Stoke, the eastern tunnel portal located east of The Avenue and the western tunnel portal located west of Normanton Gorse

Both options would include improvements for the existing junctions between the A303 and the intersecting A345 and A360.

A public consultation was launched by Highways England on 12th January and will run until 5th March 2017, for public and key stakeholders to comment on their proposals and identify any areas of concern or opportunities for further improvement.

Council officers from a variety of technical services have reviewed the public consultation material and their analysis is collated within Appendix 1. This is intended to be submitted to Highways England as the Council's formal response to the consultation.

Subject to the successful resolution of the issues identified within the main body of this report and in Appendix 1, it is recommended that the proposed routes for the scheme are supported. Where there is a preference in relation to options for the section at Winterbourne Stoke, this is included under various headings in

Appendix 1. Whilst it is recognised that the design proposals are still at a very early stage in the development process, it is necessary for further information to be made available to the Council in order for it to fully assess the proposals. Therefore, the Council should retain the ability to refine its position once the additional information is available.

Proposals

Members are asked to:

- Note the contents of this report
- Agree the proposed response to Highways England for this options appraisal and route selection public consultation
- Note the additional potential financial implications arising as a result of this scheme, which will require more detailed discussion as the preferred route is established
- To restate the Council's support in principle for the proposal from HE to bring about substantial improvements to the A303 at Stonehenge by building a dual carriageway and tunnel, subject to the comments listed in Appendix 1
- To welcome the input from the local community and any technical and information support they can supply.

Reason for Proposals

The case for dualling the A303 between Amesbury and Berwick Down has long been established through promoting economic growth in the South West, increasing safety, improving connectivity with neighbouring regions and protecting and enhancing the environment

Highways England have assessed approximately 60 historic routes and identified the 2.9km tunnel with a bypass either North or South of Winterbourne Stoke as the better performing and more deliverable route. Whilst there are several issues which will require resolution as the design is further developed, on the whole officers believe that both options are capable of addressing the transport, economic, heritage and community issues associated with the A303. They will also enable the timeframe dictated by the Development Consent Order (DCO) process to be met, achieving start on site by March 2020.

Dr Carlton Brand (Corporate Director)

Wiltshire Council

Cabinet

14 March 2017

Subject: **A303 Amesbury to Berwick Down Road Scheme**

Cabinet Member: Cllr Fleur de Rhé-Philipe

Key Decision: **Yes**

Purpose of Report

1. To inform Members of the route options appraisal methodology and outcome selected by Highways England to take to public consultation

2. To confirm the Council's response to the public consultation

3. To note the resource and financial implications for the Council with regard to this road improvement scheme

Relevance to the Council's Business Plan

4. Improvements along the A303 help meet the priorities of the Council's Business Plan, including:
    - Outcome 1 – Wiltshire has a thriving and growing local economy
    - Outcome 2 – People in Wiltshire work together to solve problems locally and participate in decisions that affect them
    - Outcome 3 – Everyone in Wiltshire lives in a high quality environment
    - Outcomes 6 – People are as protected from harm as possible and feel safe

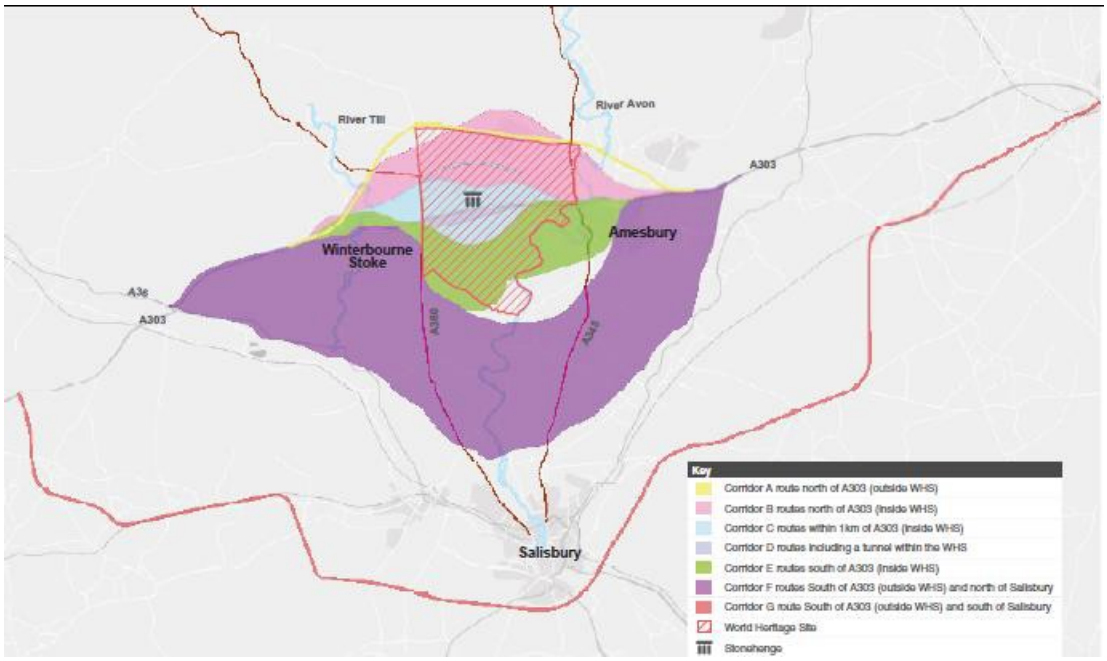
Main Considerations for the Council

5. During the past year, Highways England have been assessing all potential routes for dualling the A303 between Amesbury and Berwick Down. Approximately 60 routes had historically been proposed by Government, stakeholders and the public. These options were grouped into 8 corridors which contained route options with similar characteristics as follows:

    - Corridor A – Surface routes north of the existing A303 (wholly outside WHS)
    - Corridor B – Surface routes north of the existing A303 (partially inside WHS)
    - Corridor C – Surface routes within 1.0km of the existing A303 (as the route options pass through the WHS)
    - Corridor D – Routes including a tunnel (at least partially within the WHS)
    - Corridor E – Surface routes south of the existing A303 (at least partially inside WHS)

- Corridor F (North) – Surface routes south of the existing A303 (wholly outside WHS) and north of Salisbury
- Corridor F (South) – Surface routes south of the existing A303 (wholly outside WHS) and north of Salisbury, further south than Corridor F (North)
- Corridor G – Surface routes south of the existing A303 (wholly outside WHS) and south of Salisbury.

These are shown diagrammatically below:



6. These corridors were assessed against three criteria, being the Client Scheme Requirements (CSRs), the Web-based Transport Appraisal Guidance's (WebTAG) Early Assessment and Sifting Tool (EAST) and the National Policy Statement for National Networks (NPSNN) environmental aspects. Following this initial assessment, Corridor D, Corridor F (North) and Corridor F (South) were taken forward for further consideration.

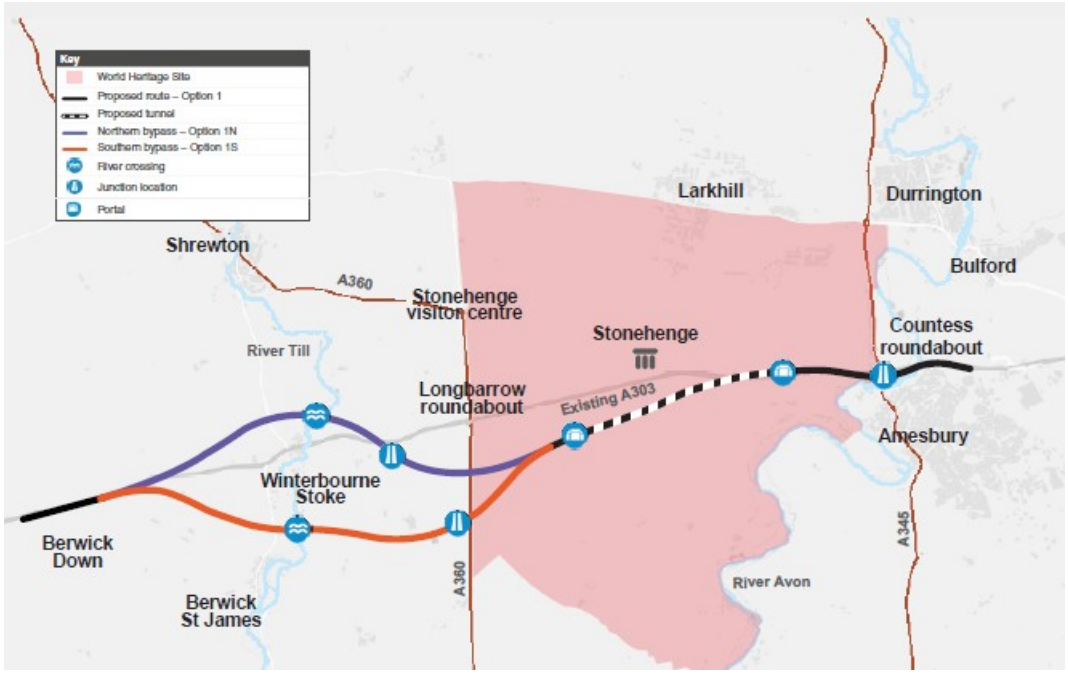
7. Four routes within Corridor D and three routes within Corridor F (North and South) were assessed against the Options Assessment Framework contained within the WebTAG Transport Appraisal Process, which is based around the Transport Business Case Five Case Model criteria. Primary considerations at this stage were the Strategic Fit assessment (fit with policy and CSRs) and the Value for Money assessment which includes the impact on the economy and the environment. As a result, three routes (two in Corridor D and one in Corridor F) were identified as the better performing routes.

8. Further analysis of these three routes was undertaken which included assessment of the following areas: traffic and journey times, scheme costs, economic, social impact, safety, operational, technology and maintenance, environmental, programme compliance and the Client Scheme Requirements (CSRs).

9. Two route options within Corridor D were selected for public consultation to further develop the design and undertake further appraisal to determine the preferred route for the scheme. These are:

- Route Option D061 – 2.9km length tunnel with route running north of Winterbourne Stoke, the eastern tunnel portal located east of The Avenue and the western tunnel portal located west of Normanton Gorse
- Route Option D062 – 2.9km length tunnel with route running south of Winterbourne Stoke, the eastern tunnel portal located east of The Avenue and the western tunnel portal located west of Normanton Gorse.

The proposal is illustrated diagrammatically below:



10. The public consultation was launched on 12th January and ran until 5th March 2017. All consultation material is available from the Highways England website (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/), with the full suite of hard copy documents available in 3 Council libraries for review and feedback forms available from a further 14 libraries. Highways England have also held 10 public exhibition events in the surrounding locality, including one in London. Promotional activity has appeared on the national and local news television programmes, in newspapers and journals, on the radio, through social media, in local amenity locations such as food stores and local schools, and in service stations along the M4 and M5 corridor.

11. Highways England have asked the public and key stakeholders for views on the proposed route and junctions, any perceived issues to be considered, and any opportunities for legacy improvements resulting from this scheme.

12. Council officers from a variety of technical services have been reviewing the consultation material to identify any concerns or opportunities and any

further information required. These have been collated in Appendix 1, which is intended to be submitted to Highways England as the Council's formal response to the consultation.

13. The key issues identified by officers include:

Highways and Transport:

- Impact of the scheme on the local road network, including any Traffic Regulation Orders (TROs) to regulate use of the former A303, and agreement under s59 highways Act 1980 in relation to non-A303 haul routes
- Design of local road elements of the scheme, including appropriate alterations of junctions as appropriate
- Surface water drainage
- Rights of way and access, including segregated crossings
- De-trunking and transfer of former Highways England assets to Wiltshire Council
- Improvements to and signing for tunnel and route diversions
- Requirements for local TROs

Public Health and Public Protection:

- Impact of noise and vibration from both the construction of the road and tunnel, and its operation on local residents
- Protection of private water supplies and associated hydrology and land drainage
- Construction impact and long term traffic related pollution at residential properties
- Dust impacts arising from construction phase, particularly during the summer months
- Impact of artificial lighting during the construction phase

Ecology:

- Effects on a number of European nature conservation designations which require detailed assessment and mitigation
- Presence of phosphatic chalk geology in the general area which the tunnel will pass through and its disposal or re-use
- Impact of Winterbourne Stoke bypass on River Till and Parsonage Down NNR / SAC
- Impacts on locally important County Wildlife Sites, priority habitats and protected / priority / notable species.
- Opportunities for ecological enhancement to be sought where possible

Landscape:

- Community and landscape severance of southern bypass route for Winterbourne Stoke
- Adoption of sufficient acoustic and visual mitigation methods for affected communities

Public Rights of Way (PROWs):

Retention and supplementation of the existing public rights of way network (subject to point 4 below) to enable walkers, cyclists, horse riders and carriage drivers a legal right of access through the WHS. This would include:

- New or existing east-west routes to connect with north-south public rights of way to ensure that continuous access is available. These to include a connection between byways open to all traffic Amesbury 11 and 12 in order to retain through access for mechanically propelled vehicles between Larkhill and Lake
- Connectivity where the rights of way would cross the new A303 route
- Consider the opportunities provided by public rights of way for people with disabilities to explore the landscape in sustainable ways – e.g. riding for the disabled, mobility buggies – and the need and cost of appropriate maintenance to facilitate their access
- Appropriate Public Path Orders where alterations would be beneficial to path users

Archaeology:

- The Eastern portal location and design are developed to minimise proximity and visual impact on the Avenue and King Barrow Ridge
- The design and location of the Western portal, expressway and junctions are developed/amended to avoid the current predicted major adverse impact on heritage and Outstanding Universal Value especially in relation to the Scheduled Barrow Groups and other attributes of Outstanding Universal Value
- The expressway and junction alignments do not adversely impact on Solstitial alignments
- On present evidence, the southern bypass routes appears to be preferable to the northern one, although there is still much more evaluation and assessment needed on the southern route
- All required archaeological evaluation within and outside WHS is completed in time to feed into the assessment work prior to route approval and submission of the DCO. This work should be done in time to help inform the preferred route decision and the detailed design of the Scheme
- Mitigation measures will be in place to offset potential adverse impact on Outstanding Universal Value and other significant heritage assets.

Built Heritage:

- Significant impact on Countess Farm, comprising six grade II listed buildings, from proposed flyover at Countess Roundabout
- 'Less than substantial harm' to grade II listed stone bridge over the Avon and Diana's House, a grade II* listed former lodge to the Abbey
- Access to A303 using Stonehenge Road from the upper Woodford valley will need to be considered
- The potential increase in noise levels affecting the Winterbourne Stoke Conservation Area will need to be monitored, with appropriate mitigation through surfacing materials and detail of cuttings and embankments

- In the event that the Southern Bypass route was selected, the significance of 'The Park' should be explored. The introduction of a dual-carriageway across the open landscape of the river valley between the Winterbourne Stoke and Berwick St James Conservation Areas would have a significant adverse visual and aural impact on both and several listed buildings. Consideration should also be given to noise impacts on Asserton Farm. The tranquil rural setting of an unlisted thatched cottage (C19 or earlier) lying to the south of the bridge would be severely compromised
- Both bypass options would offer significant improvement to the setting of the grade II* listed Manor House, Winterbourne Stoke.

14. Subject to successful resolution of the issues identified above and in Appendix 1, on the whole officers recommend that the proposed routes for the A303 Amesbury to Berwick Down scheme are supported. Where there is a preference in relation to options for the section at Winterbourne Stoke, this is included under various headings at Appendix 1.

15. However, whilst it is recognised that the design proposals are still at a very early stage in the development process, it is necessary for further information to be made available to the Council in order for it to fully assess the proposals.

Background

16. Dualling the A303 and A358 is a nationally significant infrastructure project (NSIP) as defined by the Planning Act 2008.

17. This NSIP will be promoted by Highways England under the requirements of the Planning Act to secure a Development Consent Order (DCO) to allow work to begin. This process will involve detailed engagement with the general public, local communities and stakeholders.

18. The DCO process and the role of Local Authorities within this process was the subject of a previous Cabinet report on 15 March 2016 (Cabinet Papers Item 39).

19. The timetable for the development of this road improvement scheme, the Council's involvement and governance arrangements established to fully engage and manage this project, and the estimated resource implications for the various professional areas were detailed in a Cabinet report considered on 11 October 2016 (Cabinet Papers Item 118).

Overview and Scrutiny Engagement

20. Whilst no specific Overview and Scrutiny activity has been undertaken to date, quarterly Stakeholder Engagement Meetings are being held to ensure that local Members are involved in the development of this road scheme.

21. Presentations are also being delivered at the relevant Area Board meetings in Amesbury, Mere and Warminster when requested by the Chair.

22. Furthermore, the Community Area Managers are employing the model used in the Army Rebasing Programme for communication and engagement. The Community Area Manager for Amesbury is co-ordinating all activity with the other Community Area Manager's across Wiltshire.

Safeguarding Implications

23. None

Public Health and Public Protection Implications

24. A key outcome of the scheme is to improve safety along the corridor. By creating an "expressway" dual carriageway, which is designed to high safety standards, it will increase capacity on the route, which will reduce the accident prevalence.

25. Furthermore, there are a number of issues which will need to be addressed to minimise the impact that the construction and operational phases of the scheme may have on the local area in terms of environmental health. This would include noise and vibration, air quality, dust control and light nuisance. Further detail is required to fully assess any proposed mitigating measures to minimise the impact of the scheme. It is expected that this will be available during the development of the DCO application and in advance of the statutory consultation planned for the end of 2017.

Procurement Implications

26. None

Equalities Impact of the Proposal

27. Council officers have engaged with Highways England's appointed consultants to ensure the consultation is adequately promoted within local communities, including any identified hard to reach groups.

28. Whilst some analysis of the social impact has been undertaken to date, a full equality impact assessment will be undertaken by Highways England as part of the DCO process.

29. Equality impact considerations will also be referenced within the Council's report on the appropriateness of the consultation, which is required to be submitted to the Planning Inspectorate following the DCO submission.

Environmental and Climate Change Considerations

30. As a signatory to the World Heritage Site (WHS) Management Plan (2015) and a member of the WHS Partnership Panel, the Council and its partners have a responsibility to protect the outstanding universal value of the site and any decisions relating to this will be monitored by UNESCO. A second mission by ICOMOS / UNESCO was held between 31st January and 3rd February 2017.

31. A preliminary assessment of the implications for heritage, archaeology and ecology of the proposed route has been undertaken and is included as part of Appendix 1. However, further information is required in order for the Council to fully assess the implications and as such we will continue to work with Highways England and other key stakeholders to undertake this.

32. Whilst it is anticipated that the scheme will provide benefits through improved traffic flows, thereby reducing delays and a consequential reduction in noise and excessive fuel consumption and emissions associated with slow moving or stationary traffic, further information is required to confirm this.

Risk Assessment

33. It is anticipated that engagement in this project will be controversial and it is likely that there will be conflicting views amongst the service areas involved and by Members. The Council will be required to formulate a corporate position on many of the issues considered and it is anticipated that this will be set by Cabinet following recommendations from officers.

34. Whilst these proposals are being developed, the Council may need to reserve judgement on some matters until further information is available in order for the Council to make a fully informed decision on certain key aspects.

Risks that may arise if the proposed decision and related work is not taken

35. The DCO submission may be delayed which may jeopardise the current central government funding agreement.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

36. The Council will continue to work closely with Highways England and other key stakeholders to manage the inputs required for the DCO submission.

37. Members will be regularly updated and agreement sought at each of the key stages of the DCO process.

Financial Implications

38. An indicative figure of £300,000 has been included in 2017/18 in the Medium Term Financial Strategy (MTFS) as part of budget setting to cover the additional resource requirements. Highways England have now indicated that resource expenditure may not be recovered, however Wiltshire Council are continuing to challenge this.

39. Appendix 2 of the October 2016 Cabinet report shows an initial assessment of the additional resource requirements for this programme before any potential recovery of costs from Highways England.

40. The Council will have additional resource implications for the period post consent whilst the scheme is being delivered, if applicable. These will be identified in a future report to Cabinet.

41. As outlined in the main body of the report, both options being consulted on will have future financial implications in terms of maintenance and running costs as a result of the de-trunking of the A303 as part of the DCO process. Initial assessment is that Wiltshire Council would take on a stretch of new road, a junction and a roundabout, which may include new traffic signals and street lighting. Historically when roads have been de-trunked, Highways England have compensated Local Authorities for the additional maintenance burden the roads would present. At this stage future financial implications cannot be quantified. This would be done later in the DCO process.

Legal Implications

42. Section 22 of the Planning Act 2008 sets out criteria for Highway schemes to be considered as nationally significant infrastructure projects and therefore capable of being dealt with under the Development Consent Order (DCO) process.

43. This process was introduced with an aim that it would be a one stop shop for any significant infrastructure project (including some processes which normally the Council may have been the decision maker). The Stonehenge project falls into this category.

44. It is Highways England who will be the lead body in any application for a DCO.

45. The role of the Council within this process is as a statutory Consultee (and one of the principal consultees). It is inevitable that there will be a number of Council facets that will be engaged.

46. We are currently at the pre-application stage whereby Highways England are seeking at an early stage comments on a 1.8 mile (2.9 kilometer) tunnel under part of the World Heritage Site (WHS), a bypass for Winterbourne Stoke and improve the existing junctions between the A303 and the intersecting A345 and A360.

47. As part of the consultation documents they have included a technical appraisal report setting out the background to the proposals. Part of that appraisal considered options which took the A303 outside the world heritage site completely (F10).

48. This option scored highly on cultural heritage but less strongly on the other aspects (transport, economic growth and environment and community) and therefore Highways England have identified as their preferred option two options (D061 and D062) which both include the tunnel.

49. It is correct that the design proposals are still at a very early stage in the development process, it is necessary for further information to be made available to the Council in order for it to fully assess the proposals. Therefore, the Council should retain the ability to refine its position once the additional information is available.

50. However for the purposes of the pre-application consultation stage Legal Services are satisfied that the draft report fairly and professionally reflects the multi facets that the Council are involved with in this proposal.

Options Considered

51. None

Conclusions

52. The case for dualling the A303 between Amesbury and Berwick Down has long been established through promoting economic growth in the South West, increasing safety, improving connectivity with neighbouring regions and protecting and enhancing the environment.

53. Highways England have undertaken an option appraisal of approximately 60 historical routes and identified a 2.9-kilometre tunnel under part of the World Heritage Site, a bypass for Winterbourne Stoke (either to the North or to the South), and improvements for the existing junctions between the A303 and the intersecting A345 and A360 as the better performing and more deliverable option.

54. Following assessment of the proposals by Council officers, it is recommended that support is given to Highways England to develop a preferred route and address the identified issues contained above and in Appendix 1. However, whilst it is recognised that the design proposals are still at a very early stage, the Council must retain the ability to refine its position once the additional information is available.

55. Members are asked to:
    - Note the contents of this report
    - Agree the proposed response to Highways England for this options appraisal and route selection public consultation
    - Note the additional potential financial implications arising as a result of this scheme, which will require more detailed discussion as the preferred route is established
    - To restate the Council's support in principle for the proposal from HE to bring about substantial improvements to the A303 at Stonehenge by building a dual carriageway and tunnel, subject to the comments listed in Appendix 1
    - To welcome the input from the local community and any technical and information support they can supply.

Dr Carlton Brand (Corporate Director)

Date of report: 23rd February 2017

Appendices

Appendix 1 – Wiltshire Council Non-Statutory Consultation Response to Highways England for A303 Amesbury to Berwick Down (Stonehenge) Road Improvement Scheme

Background Papers

The following documents have been relied on in the preparation of this report: None

Appendix 1

A303 Non-Statutory Public Consultation Response by Wiltshire Council

Contents of Paper:

I. Introduction and Context

1. The proposal the subject of this consultation raises many considerations for the Council, which can be summarised into two key questions:

    - Does the proposal accord with the strategy for this area of Wiltshire as set out in the Wiltshire Core Strategy?

    - What are the technical issues raised by the proposal and what, if any, mitigation should be required as a consequence of any potential impacts?

2. The first consideration is to consider how the proposals help deliver the Council's strategic objectives as set out in the Core Strategy. Secondly, consideration of the specific impacts that a scheme of this scale may have on the environment and if it is possible to mitigate them.

II. Consideration of Strategic Objectives

Economic Considerations

3. The Wiltshire Core Strategy is an economy-led strategy, which unequivocally places an emphasis on economic growth as the driving force behind meeting its objectives. The underpinning idea of the strategy is to strengthen communities, wherever possible,

by maintaining and increasing the supply of jobs to ensure that Wiltshire remains strong and prosperous.

4. In strategic planning terms, Wiltshire faces a number of challenges, of which reducing levels of out-commuting from many of the county's settlements is a significant one. Evidence suggests that lack of local job opportunities and pay differentials are a major driver meaning that higher earners commute out of the county to work. To address this, the self-containment of the main settlements needs to be improved to ensure that there are a wide range of appropriate employment opportunities available, reflecting the needs of inward investors and Wiltshire's communities. Delivering a good level of local employment opportunities close to the main centres of population will help reduce the need to commute out of Wiltshire to seek work. Broadening the employment base and providing choice in the job market for Wiltshire's population is a key element of delivering resilient communities.

5. Strategic Objective 1: "Delivering a thriving economy" makes clear that *"Wiltshire needs to encourage a buoyant and resilient local economy. The Core Strategy enables development to take place and encourages economic vitality, providing local jobs for Wiltshire's population, whilst ensuring that sustainable development objectives have been met……"*

6. The wider strategy of the Wiltshire Core Strategy, is to accelerate the transition toward high value and innovative local jobs to offset the traditional declining sectors such as financial services. One of the key outcomes of the Strategic Objective 1 is that Wiltshire will have secured sustainable growth of established and emerging employment sectors, building on existing strengths, including defence-related employment, bioscience, advanced manufacturing and business services.

7. A significant part of the proposal falls within the Amesbury Community Area. The Core Strategy vision for Amesbury includes that Amesbury will have good levels of employment, including the specialist sectors within the MoD, QinetiQ at Boscombe Down and the scientific research at Porton Down.

8. Core Policy 4 identifies the Boscombe Down site in this community area as a Principal Employment Area as well as allocating 7 ha of employment land on the site. Core Policy 35 states that Wiltshire's Principal Employment Areas should be retained for employment purposes within use classes B1, B2 and B8 to safeguard their contribution to the Wiltshire economy and the role and function of individual towns. Proposals for renewal and intensification of the above employment uses within these areas will be supported.

9. Core Policy 37 relates to Military establishments, of which Boscombe Down is one. This policy offers support for new development at such operational facilities that help enhance or sustain their operational capacity.

10. Core Policy 4 also allocates 10 ha of employment land at Porton Down in the Amesbury community area, where the establishment of a private sector science park is currently ongoing.

11. There is therefore already a significant cluster of excellence centred on scientific defence, research and development operating in this community area and using them as leverage to attract synergistic inward investment is a key objective of the Wiltshire Core Strategy.

12. The area strategy for the Amesbury community area lists specific issues that need to be addressed in planning for this area. It recognises that the A303 corridor runs through the area and is a main arterial route from London to the south west. It suffers from problems, with intermittent stretches of single lane carriageway causing large delays at peak times. This has a knock-on effect on the attractiveness of the area for business and tourism investment.

13. Effective, efficient road links are fundamental to enable businesses to prosper and help to unlock further economic growth. The A303 scheme between Amesbury and Berwick Down will significantly reduce journey times which in turn will cut transport costs, and give businesses in Wiltshire better access to the market, suppliers and skills. Wiltshire's inward investment attractiveness will also be strengthened and the creation of an expressway will improve accessibility between businesses and their customers. The scheme will also help to link people with jobs and provide better access towards higher value, local jobs which in turn will contribute towards reducing out-commuting from Wiltshire.

14. At a regional level, the South West region is home to one of the largest concentration of aerospace and defence activities in Europe and the largest cluster in the UK, with its local supply chain supporting 14 of the world's leading aerospace / defence companies. The centre of excellence developing at Boscombe Down and Porton Down is a significant part of this. The A303 scheme will consolidate this position by improving connections between regional business communities, enabling more efficient access to their supply chains as well as providing employees better access to high skilled jobs.

Conclusion on Economic Considerations

15. In principle, therefore, the proposal for the improved road will play a pivotal role in contributing towards the implementation of various key policy and strategy priorities set out in the Core Strategy.

16. The established Plan for job growth and meeting the needs of business are central to the Core Strategy. This plan puts in place policies which will help both attract new inward investment and help existing business meet their aspirations in Wiltshire, as well as providing the right environment for business start-ups. The A303 scheme will remove a potential barrier to investment, improve connectivity between businesses and their customers, and provide employees with greater access to higher value jobs.

Tourism Considerations

17. Tourism plays a significant part in the economic health of Wiltshire and is worth over £779 million a year. Wiltshire has a wealth of natural and heritage assets which attract visitors from home and abroad that range from one of the world's most famous and recognisable monuments, Stonehenge, to renowned attractions such as Longleat Safari and Adventure Park to country houses, museums and gardens. Rural countryside within the AONBs, Wiltshire's canal network, historic villages such as Lacock and farm and animal attractions also draw visitors to the area. Wiltshire is also well placed for visiting attractions such as the New Forest National Park, the Cotswolds, Bath Spa and the major resorts and beaches at Bournemouth and Poole. Wiltshire's built and natural environment is a key part of the tourism product and the future success of the area's tourism industry is, in many ways, dependent on the effective management and conservation of the environment.

18. The Spatial Vision of the Core Strategy states that by 2016, Wiltshire's heritage will have been a major driver used to promote tourism for economic benefit.

19. Strategic Objective 1 "Delivering a thriving economy" recognises that the potential of tourism should be realised as a major growth sector through capitalising on the quality of the environment and location Wiltshire benefits from. The Core Strategy identifies that one of the key outcomes of this objective will be that Wiltshire's tourism sector will have grown in a sustainable way, ensuring the protection and where possible enhancement of Wiltshire's environmental and heritage assets.

20. The Core Strategy recognises that World Heritage Site (WHS) status offers the potential of considerable social and economic gains for Wiltshire in areas such as sustainable tourism, but that this will require careful and sensitive management in order to protect the WHS and sustain its OUV (para 6.144). Large numbers of overseas visitors, as well as domestic tourists consider Stonehenge a "must-see" attraction. However, there is a lack of capital made on this unique opportunity locally. The A303 scheme will reconnect Stonehenge with the rest of the WHS lying to the south of the A303, give the public greater access to the wider prehistoric landscape and improve the setting of the WHS, all of which will boost tourism in Wiltshire.

21. By upgrading the A303, improving journey times and accessibility to Wiltshire will help to boost tourism, increasing visitor expenditure, making Wiltshire more accessible to tourists, and potentially providing opportunities to promote Wiltshire's strengths as a short break destination.

Conclusion on Tourism Considerations

22. The A303 scheme will have a twofold impact on tourism in Wiltshire. First, it will improve the setting of the WHS and access to the wider prehistoric landscape (see section below); second it will improve the accessibility of Wiltshire as a whole to tourists. This boost to tourism will clearly then have positive impacts on the economy of the county, and aligns very closely therefore with the economy-led Core Strategy.

Environmental Considerations

23. Wiltshire's World Heritage Site (WHS) is a designated heritage asset of the highest international and national significance, and consists of two areas of approximately 25 sq km centred on Stonehenge and Avebury. It is internationally important for its complexes of outstanding prehistoric monuments. The setting of the WHS beyond its designated boundary also requires protection as inappropriate development here can have an adverse impact on the site and its attributes of Outstanding Universal Value (OUV).

24. The Spatial Vision of the Core Strategy writes that by 2026 (the end of the plan period), Wiltshire's important natural, built and historic environment will have been safeguarded. Strategic Objective 5 seeks to protect and enhance the natural, historic and built environment and as part of this, the Stonehenge and Avebury World Heritage Site will be protected from inappropriate development and controlled in a way which sustains its OUV. One of the key outcomes for Strategic Objective 5 is that the WHS and its setting will have been protected from inappropriate development in order to sustain its OUV.

25. The area strategy for the Amesbury community area states that one of the specific issues to be addressed in this area relates to future improvements to the A303 and that the council will continue to work with partners to ensure that any future improvements to the A303 do not compromise the WHS.

26. Core Policy 58 aims to ensure that Wiltshire's important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life. Development should protect, conserve and where possible enhance the historic environment.

27. Core Policy 59 states that to sustain the OUV of the WHS opportunities will be sought that support the positive management of the WHS through development that, inter alia, reduces the negative impacts of road, traffic and visitor pressure.

28. Core Policy 6 also seeks to protect Stonehenge and its setting so as to sustain its OUV. It explains that new visitor facilities will be supported where they:

- Return Stonehenge to a more respectful setting befitting its World Heritage Status;
- Include measures to mitigate the negative impacts of the road.

29. Therefore it was always the case that the advent of the new visitor centre was only part of the overall vision and that reducing impact of the roads was critical.

30. The Core Strategy is clear, therefore, that sustaining the OUV of the WHS is a key consideration, and recognises that the A303 currently has a negative impact on the setting of the WHS. Currently, the A303 cuts through the middle of the WHS, and the roar of traffic and headlights are an intrusion on the peace and sanctity of Stonehenge, compromising its integrity and harming the setting of many monuments. The proposed tunnel would reconnect Stonehenge with the two-thirds of the WHS lying to the south of the A303 and currently cut off by it. The tunnel would make the setting of the ancient stone circle more tranquil, give the public greater access to the wider prehistoric landscape and improve the environment for wildlife.

31. However the decision makers in this instance [as a nationally significant infrastructure project, this scheme will be dealt with under the Development Consent Order (DCO)] will need to ensure that the planning balance is addressed in relation to the adopted policy supporting the scheme to upgrade the A303 for the economic benefits and removal of the road from view, against other policies of the plan which seek to ensure that new development does not do significant harm to the OUV of the WHS, ecology, landscape and residents. The Environmental Statement required to accompany the proposal must objectively scrutinise the potential impacts, such as the impacts the construction of the tunnel portals and expressway will have upon the WHS only once this assessment work has be completed and carefully considered can a decision on the planning balance be reached.

Conclusion on Environmental Considerations

32. Reducing the negative impact of the A303 on Stonehenge is a clear objective of the Core Strategy, as well as protecting its setting. The proposal represents an opportunity not only to remove the existing harm that the current A303 has on the WHS, but also to ensure significant benefit to the WHS, as well the natural environment.

33. Clearly, full and detailed Environmental and Heritage Impact Assessments will need to form part of the further work to be undertaken by Highways England, and detailed comments are provided below from specialist sections of Wiltshire Council to inform this work. Therefore while there is strategic support for the proposals in principle, the decision must be made on the application of a balanced judgement through comparing

the benefits that will accrue against the extent of any environmental harm that will occur and how this can or cannot be mitigated.

III. Highways and Transport Considerations

34. The consultation package includes a Technical Appraisal Report (TAR) setting out the background to the proposals for the improvement to the Amesbury to Berwick Down section of the A303.

35. Highways England, as the (DCO) developer for the scheme, has identified four Client Scheme Requirements. The first of these is the transport objective which states, in expanded form:

- *The road will be designed to modern standards and, in addition, to perform as an Expressway.*
- *The design of the road and connections with the local network will address issues of congestion, resilience and reliability. It will reduce risk of traffic diverting onto local roads.*
- *Road safety will be improved to at least the national average for a road of this type*.

36. The Council was involved in the determination of the Client Scheme Requirements, so it is reasonable to state that they are aligned with the Council's position. Past considerations by the Council have supported the provision of a tunnelled solution on a similar line to that now proposed. The extent of the problems caused for local residents affected by traffic diverting away from the A303 to avoid the regular congestion and delays on the route were highlighted in a report commissioned by the Council[1]. Those findings have been included as evidence in the TAR

Traffic Capacity

37. It is clear from the information supplied in the TAR that the proposed scheme would provide adequate capacity on the A303 for forecast demand flows to beyond 2051. The benefits of providing adequate capacity immediately addresses the principal issues of concern ('rat-running') to the communities of Amesbury, Larkhill, Durrington and Bulford, by providing a faster route for through traffic than is provided for on any of the alternative routes. The TAR identifies at Section 10.2 the forecast reductions in traffic flows on the local alternative routes if the scheme should proceed.

Route Options

38. The consultation options, identified as Route Option D061 and Route Option D062, share a common route for the eastern section of the scheme, but offer alternative bypass option routes around Winterbourne Stoke; D061 provides for a northern bypass of the village and D062 a southern bypass. In terms of overall performance the TAR indicates that both options provide very similar transport benefits, and both routes are about 0.4km longer that the existing A303 between either end of the scheme.

Junctions

39. The scheme would provide grade separated junctions at the junctions with the two principal roads, the A345 (Countess) and the A360 (Longbarrow).

[1] A303 Routeing Study. Atkins Report - 2014

40. The A345 junction was previously designed to accommodate a flyover for the A303 mainline. It is proposed that the junction be lit only at the lower roundabout level. No details are yet available as to the control of the junction, but it is likely that the traffic signals will become redundant.

41. The existing services at Countess will be accessed by way of a new eastbound slip road from the roundabout. The entrance is very close to the roundabout and conspicuity is relatively poor; the Council would wish to be assured that as a slip road, with potentially greater urgency to accelerate to match mainline merge traffic speeds, this access will be appropriately modified and/or signed.

42. The D061 option would have a grade separated junction where the new line crosses the existing A303, with a link eastwards to connect with Longbarrow roundabout and the A360 and an arm connecting via the existing A303 to Winterbourne Stoke.

43. The D062 option provides for a new grade separated junction to the west side of the A360 (to be outside of the WHS). Access from Winterbourne Stoke to the A303 would be via the existing A303 route to Longbarrow roundabout then southwards to this junction.

44. In both options the existing Longbarrow roundabout would remain as a junction. However, its use would be substantially reduced and it would be appropriate that this junction be modified to reflect the loss of a material east facing arm (except perhaps for access to agricultural frontage and NMU use) and a substantial reduction in traffic volumes accessing Winterbourne Stoke on the western arm, and modifying approach arms on the A360.

45. It is stated that it is not intended to provide street lighting on the A360 junction, but safety issues will be addressed through formal processes, as details are pursued. Wiltshire Council, as a local highway authority, provides street lighting at roundabouts as a matter of policy, and this should be drawn to the attention of HE.

46. It is not intended that a junction be provided for Winterbourne Stoke at the western end of the scheme. This will result in benefits and disbenefits for the residents of and visitors to Winterbourne Stoke. On the one hand residents will need to travel eastwards to the A303/A360 junction in order to travel westwards on the A303, which will clearly add, by degree, to the journey times and costs of residents. On the other hand, the community will benefit from the maximum reduction in through traffic achievable. It is, of course, not a benefit to those businesses that rely on passing trade.

47. Consideration will need to be given to the need to review the layouts of the B3083 junctions with the detrunked A303. It is likely that the B3083 route will become a more attractive through route for local traffic because current difficulties in crossing the A303 through the village will have been removed. This is an issue the Council should discuss with Highways England, in consultation with the parish council.

48. The general location (but no detail as to geometry) of the junctions is shown in outline on the drawings at Appendix F of the TAR. (Description of route options for further appraisal).

Public Rights of Way PRoWs

49. The option schemes will have an effect on public rights of way falling within the options corridor. As a result of the length of tunnelled section of road there are rights of way (e.g. Byways 11 and 12) which benefit from a reduction in severance due to the loss

of the existing live A303, or a reduction of traffic remaining on the route. Drawings at Appendix F of the TAR show all those PROWs adversely affected by the scheme. Paragraph 8.9.1 of the TAR identifies that Route Option D061 bisects five PRoWs including two bridleways and three byways, and Route Option D062 bisects six PRoWs including two footpaths, two bridleways and two byways.

50. It is possible that some routes affected by the bypass options for Winterbourne Stoke could be considered for diversion and/or combining to achieve common crossing points. Regardless, it is the responsibility of the Council to protect its rights of way, and to this end grade separated crossings of the A303 would be sought to provide for the greatest level of safety. At grade crossing points (such as occur at some other locations on dualled sections of the A303) are not desirable. The Council should make representations in this regard.

51. The thorny issue of traffic on Byway 12 is not addressed in the proposals, as it is not a directly related aspect of the scheme proposals. The Council, is a partner signatory of the Stonehenge and Avebury WHS Management Plan; Policy 6b of the Management Plan considers the need to address the damage caused by traffic on the byways in the WHS. It is likely that the amount of traffic finding its way onto Byway 12 following the closure of its junctions with the A303 will be minimal (access being available only from Druids Lodge Farm area and Durrington), and that the concerns for this Byway will have been largely addressed by default. The issue of prohibiting driving on the local byways was previously considered by the Council in 2011[2].

Tunnel Maintenance and Diversion Route

52. The nature of tunnels is that they require regular routine maintenance involving closure. The TAR indicates that regular maintenance of the bores will be undertaken at night when traffic flows are at their lowest. One bore would be maintained at a time, with either the other bore being used for contraflow traffic, or for traffic diverted from the closed bore being diverted to a different route.

53. The local diversion route for closures on the tunnelled section is the same as the route identified as a high load route, namely the A360/B3086/The Packway/A345. Whilst there is unlikely to be an issue in relation to capacity on this route for planned diversions, there are concerns about the B3086/The Packway crossroads junction. It is the officers' view that this junction should be modified to be better able to accommodate both planned and unplanned closures of the tunnel section as an integral part of the DCO proposals.

54. The aspiration of Government is that the A303 shall be an 'Expressway' [3], ('Expected to meet a minimum standard' – a dual carriageway that is safe, well-built and resilient to delay, and 'Subject to much clearer expectations over performance' – so Highways England is held to account for how well traffic is moving). Such routes use technology to facilitate e.g. regular variable message signs to aid the management of the route and assist the travelling public. At this stage there is no detail as to how such management arrangements would be intended to work either for the Amesbury to Berwick Down section of the A303 or to the east and west of the section. The Council should seek to understand how such messaging might affect drivers' route choices on Wiltshire roads when confronted with delay or diversion messages.

[2] REPORT TO WILTSHIRE COUNCIL FILE REF: DPI/T3915/11/20 Prohibition of Driving Order at Stonehenge November 2011

[3] Action for Roads - A network for the 21st century. DfT July 2013, p34

55. Planned closures of the tunnels can be signed remotely at both eastern and western approaches, so that long distance drivers have the opportunity to take alternative high standard routes, such as the M4/M5. Inevitably, however, especially with unplanned closures, the volume of traffic using the alternative route could be material, and have adverse environmental impacts on the Larkhill community. Whilst there should be no serious concerns about the route being used for high loads (above 5.03m, and relatively uncommon), the Council should seek further information on the potential effects on the diversion route from general diverted traffic.

Detrunking Issues

56. The consultation options provide for the closure of the existing A303 to general traffic between Countess and Longbarrow junctions. Some parts of the redundant A303 will be used for general access, such as the length to the east of Winterbourne Stoke to Longbarrow. The existing road, where superseded by the new route, will be 'detrunked', downgraded or stopped up as circumstances require. Whichever way, those redundant sections of road will revert either to the Council as the local highway authority, or to private interests if stopped up. There are sections of the road which serve only private interests for vehicular access, including, for example, access to Stonehenge Cottages and to agricultural land. No detail is provided in the TAR in relation to the intentions for Old Stonehenge Road, but the road could provide a potential access to some local private frontagers, including the Stonehenge Cottages and the top of the eastern portal.

57. The scheme details do not seek to identify the end uses of all parts of the road, but suggest that sections will need to be kept open for local use, including potentially being available for use by non-motorised users to improve access to parts of the WHS. For those sections which fall to the responsibility of the Council under DCO detrunking procedures, it is normal practice for the LHA to be compensated by HE for the additional maintenance burden the roads will present to the Council. The Council therefore needs to have agreed, when the DCO application is submitted, what the compensatory arrangements will be and what will be the end uses of all redundant sections of the A303 route.

Excavated Materials

58. A balance of cut and fill materials on the site will be a principal objective. The tunnels will either be bored with a tunnel boring machine (TBM) or excavated by other means internally if a sprayed concrete lining is used. In either event a considerable amount of material will be removed from the tunnel bores as a result. If a TBM is used there is uncertainty as to the potential re-use of the arisings. If a sprayed concrete lining is used, then excavated material is likely to be suitable as embankment fill material. If TBM arisings have to be removed from site there could be a considerable impacts on local haul roads. In such circumstances the Council should seek to protect its roads under the legal provisions available at s59 of Highways Act 1980, through agreement with HE

Traffic Regulation Orders

59. Highways England have advised that Traffic Regulation Orders can be included in the DCO process provided they are part of the project. The Planning Act S2008, s33(4), requires, in effect, that orders which would otherwise be made under provisions of the 1980 Highways Act (under sections10, 14, 16, s18, 106, 108 and 110) cannot be made outside the DCO application; TROs are made under the provisions of the Road Traffic Regulation Act 1984, and therefore not precluded outside of the DCO process. The

Council will need to be assured, before the DCO application is made, that all identified necessary TROs are indeed included in the process, in particular that it is not left for the Council to address TROs necessary to regulate traffic on the existing county road network, or on any de-trunked sections of the existing A303.

Winterbourne Stoke Route Option Preference

60. Route options D061 and 062 provide similar overall benefits. The D061 option is stated in the consultation documents as having a more problematic junction arrangement for access to the A360, because it would involve a grade separated junction on the live existing A303 route. The D062 option provides for an off-line grade separated junction for the A360, which would involve more straightforward construction. For Winterbourne Stoke villagers wishing to access the A360 (north and south), both options are similar. However, for trips requiring access to the A303 the north side route would provide a materially shorter route, because its junction would be circa 2.5 km closer to the village centre than the south bypass option.

61. Notwithstanding the issues identified with construction, or other issues raised in this report on archaeological, ecological or other grounds, it would appear that the north bypass option would best suit the travel needs for Winterbourne Stoke A303 users. The two routes around Winterbourne Stoke are likely to have different effects on traffic use of the B3083, with consequential impacts on e.g. Berwick St James for A36 access. Local traffic management might be appropriate to impose a degree of control on traffic types using the road.

62. In broad terms, there appears to be no over-riding case, from a transport perspective, to favour Route Option D061 over D062; HE should be asked to favour the most sustainable route in terms of minimising total vehicle-kilometres, all others matters being equal.

Summary on Highways and Transport issues

63. Wiltshire Council Highways and Transport has worked closely with Highways England in developing the proposals and is satisfied with the proposals in general. However, the Council anticipates a number of aspects will have to be resolved with Highways England if adversarial representation to the Examination by the Planning Inspectorate is to be avoided following submission of the DCO application:

- Impact of the scheme on the local road network, including any TROs to regulate use of former A303, and agreement under s59 Highways Act 1980 in relation to non-A303 haul routes.
- Design of local road elements of the scheme, including appropriate alterations of junctions as appropriate
- Surface water drainage
- Rights of way and access, including segregated crossings
- De-trunking and transfer of former Highways England assets to Wiltshire Council
- Improvements to and signing for tunnel and route diversions
- Requirements for local Traffic Regulation Orders

IV. Public Health and Public Protection Considerations

64. There are a number of potential impacts that the construction and operational phases of the A303 Amesbury to Berwick Down project may have on the local area in terms of environmental health.

65. Identifying and addressing these at an early stage will allow practical mitigation measures to be built in to the scheme.

66. The public consultation document does not currently give sufficient detail in respect to these issues, as it is still relatively early in the project planning stage. However, as the project develops we would expect the following issues to be addressed to minimise the impact of the scheme.

67. It is acknowledged that this is early to be submitting full comments so the public protection service would reserve the opportunity to make further comment as more detailed information emerges.

Noise and Vibration

- Impact from road and tunnel construction including hours of work, vibration (tunnelling and piling operations), positioning of work compounds and plant and vehicle storage
- Long term impact from traffic noise particularly on elevated sections and where future development may introduce new dwellings adjacent to the new route

Private Water Supplies

- The Council is responsible for monitoring and risk assessing several private water supplies in Winterbourne Stoke which provide drinking water to a number of properties. The water supplies and associated hydrology and land drainage need to be protected from any impacts from both the construction and operational phases of the scheme

Air Quality

- Impact from both the construction phase and long term traffic related pollution at relevant exposure (residential properties)

Dust Control

- Impact from the construction phase particularly during the summer months (soil stripping, spoil disposal, creation of cuttings and bunds)

Light Nuisance

- Impact of artificial lighting (for working and security) during the construction phase and operation phase.

V. Ecology Considerations

68. The proposed scheme has the potential to have effects on a number of European nature conservation designations including the River Avon SAC, Salisbury Plan SPA / SAC, Mottisfont Bats SAC and Chilmark Quarries SAC; effects upon these sites will need to be assessed in accordance with Regulation 61 of the Habitats Regulations. The assessment will need to consider direct effects such as the river crossings over

the Avon and the Till and indirect effects on functionality linked land which may be used by mobile qualifying features which occur outside of the designation boundaries. One particular issue to be addressed is likely to be the presence of phosphatic chalk geology in the general area which the tunnel will pass through, and any impact on aquifers and downstream watercourses needs to be controlled, while careful consideration will also need to be given to how any phosphatic chalk overburden might be safely reused in the local area, or whether this material will need to be disposed of elsewhere. The assessment will also need to consider in-combination effects from other relevant plans and projects in the area such as the Wiltshire Core Strategy and the Army Basing Programme.

69. The two options for the Winterbourne Stoke bypass appear broadly similar in terms of potential impacts upon the River Till, however the impact would depend upon the detailed topography and engineering design at either location. The northern routes will bring the road very close to Parsonage Down NNR / SAC, introducing potential impacts upon sensitive chalk grassland and populations of marsh fritillary butterflies, while the southern route would avoid such impacts.

70. The scheme is also likely to impact on a number of locally important County Wildlife Sites, priority habitats and protected / priority / notable species. The final route and detailed design should take full account of these features to ensure that impacts are avoided wherever possible and mitigated where impacts cannot reasonably be avoided. Compensation should be provided as a last resort for any residual impacts which cannot be avoided or mitigated fully.

71. Opportunities for ecological enhancement should also be sought where possible, for example road cutting and use of chalk overburden from the tunnel provide opportunities to create areas of new chalk grassland habitat in the local area.

VI. Landscape Considerations

72. Overall the undergrounding of the A303 through the World Heritage Site will bring large landscape benefits; through the reconnection of physical landscapes and the improved setting and experience of the monuments and OUV. The landscape and visual impacts of the portals can be minimised by testing the different design options that best fit with buried and upstanding archaeological remains. There will be 2km of residual landscape severance within the WHS where the A303 enters the portals at either end of the tunnel.

73. To the west of the tunnel the scheme aspires to create a bypass for the village of Winterbourne Stoke with north and south alternative routes. The northern by pass would place the road further away from Listed buildings and the conservation area of Winterbourne Stoke. The character of the route is typical of the downland landscape that the A303 passes through either side of the tunnel. Although the route passes close to Parsonage Down and some burial mounds, few landscape elements will be removed. Construction would also include a bridge over the River Till and some means of maintaining connectivity for the B3083 and PROWs.

74. The southern route passes between Winterbourne Stoke and Berwick St James, introducing noise and visual intrusion into a quiet tranquil section of the River Till Valley. It will create a perceived severance between the communities and result in a substantial loss of landscape elements. The road would have a strong influence over both villages which might require measures for acoustic and visual mitigation.

75. Therefore, the preferred bypass option at this stage, would be for the Northern route due to the perceived less adverse effects on loss of landscape and visual amenity to local residents.

VII. Public Rights of Way (PROWs) Considerations

76. It is Wiltshire Council's statutory duty to protect the rights of the public to use highways. These highways include public rights of way. We should therefore seek to retain existing rights and, where roads are stopped up, retain appropriate public rights of way along these routes.

Stonehenge Tunnel Area

77. There are a number of north-south public rights of way which cross or terminate at the A303. The A303 currently provides an east-west highway link between these rights of way, however, most rights of way users at the moment would not use the route to link between them. The removal of road traffic can provide new opportunities for users of non-mechanically propelled vehicles (mpv) to explore the Stonehenge landscape, in line with the aspirations of the management plan. The connectivity currently provided by the A303 from West Amesbury (Stonehenge Road) through to byway AMES11 should be retained after the road is removed.

1) AMES44 (bridleway, Ratfyn crossing) – this connection should be maintained, even if the proposed alterations at Countess Roundabout may have some impact

2) AMES10 (bridleway) – should be unaffected by the proposals

3) AMES13 (footpath) – should be unaffected by the proposals

4) AMES11 (BOAT) – ends at A303. The connectivity between the end of AMES11 and AMES12 should be maintained in order to link rights of way of equal status together to avoid creating dead-end routes, or an alternative and equally convenient link between these two byways should be provided.

5) AMES12 / WCLA1 (BOAT) – should be retained on its current line. Although use of this byway by mpv's causes some damage to the surface, which can spoil the experience for other users, the route is vital as it provides sustainable north-south access through the WHS. The closure of the A303 and A344 may lead to an increase in use of the BOAT by mpv's. This is because it will be the only means by which those who cannot use other forms of transport can enjoy a reasonably close view of the henge without entering through the visitor centre and taking the shuttle buses. As has been demonstrated by the recent closure of one road, the A344, this inevitably puts pressure on the remaining PROW of commensurate status. The planning requirements for the Stonehenge visitor centre took this into account with regard to providing sustainable access from the North along byway 12 (Larkhill) and a condition was added to ensure that it was made fit for purpose by EH. The tunnelling of the A303 will effectively remove a much greater link from the existing network and it should be anticipated that additional pressures will be placed onto the remaining byways-by all classifications of users. The tunnelling of the A303 will remove Stonehenge itself from the nation's gaze, casual viewing pleasure and their deeper subjective connection with the monument and this should not be underestimated.

6) Easy pedestrian access to the King Barrows should be retained. There is currently a small parking area just east of the Longbarrow roundabout; consideration should be

given to retain this and possibly extend to provide this access as it is on the periphery of the WHS

7) Formal public access should be retained along the line of the A303 from the Longbarrow roundabout to AMES12. The route should be dedicated as a restricted byway, again to provide access for carriage drivers.

Northern Bypass Route

1) WSTO6A – appears to be unaffected

2) WSTO6B – might go underneath the proposed bridge, if not connectivity should be maintained

3) WSTO4 – appears this would run underneath the proposed bridge, if not connectivity should be maintained

4) WSTO3 – appears to be unaffected

Southern Bypass Route

1) BSJA9 – appears to be unaffected

2) BSJA6 and BSJA8 – appears this would go underneath the proposed bridge, if not connectivity should be maintained

3) BSJA10 (BOAT) – might go underneath the proposed bridge, if not connectivity should be maintained

4) BSJA3 (bridleway) and BSJA3A (BOAT) – these routes currently terminate at the A303. It would be acceptable to stop up BSJA3. BSJA3A should be linked across to SLAN3 so users would not need to access the A303

VIII. Archaeology and World Heritage Site Considerations

Background and Policy Context

78. The Wiltshire Council Archaeology Service has a statutory duty to advise on the impact of development proposals on archaeological remains in the County, both within and outside of the Stonehenge and Avebury World Heritage Site (WHS). We take into consideration direct physical impacts on known and potential designated and undesignated heritage assets, issues of setting and visual impact, and in the case of the WHS, possible impact on the attributes of Outstanding Universal Value (OUV). In relation to the A303 Improvement Scheme (the Scheme) we will also have a responsibility for the monitoring and discharge of archaeological conditions/requirements imposed as part of the Development Consent Order (DCO).

79. In addition to our formal statutory role we have been engaged with the Scheme's development over the last few months via a number of working groups associated with the Scheme such as the Natural and Cultural Heritage Working Group, the International Council on Monuments and Sites (ICOMOS) Working Group (set up to respond to issues raised in the initial ICOMOS International Advisory visit in the Autumn of 2015 and subsequent report) and the Heritage Monitoring and Advisory Group.

80. The Council co-funds (with Historic England) and hosts the WHS Coordination Unit within the Archaeology Service. The Unit currently consists of a WHS Partnership Manager and a WHS Partnership Officer tasked with implementing the policies and objectives in the WHS Management Plan.

81. In assessing the potential development impacts of the Scheme as mentioned above, the Archaeology Service is obliged to assess the Scheme in relation to a number of policy documents including:

- The 2015 Stonehenge and Avebury WHS Management Plan with its key policies of protection and enhancement of the Outstanding Universal Values of the WHS. This plan has been formally endorsed and adopted by Wiltshire Council in 2015

- The Wiltshire Core Strategy (2015) includes a specific robust policy (Policy 59) to ensure the protection of the WHS and its setting from inappropriate Development in order to sustain its outstanding universal value

- National Planning Policy Framework (NPPF 2012) para 132 and Practice Guidance Further Guidance on World Heritage Sites (2014). These documents set out that substantial harm to or loss of designated heritage assets of the highest significance should be wholly exceptional

- The ICOMOS Guidance on Heritage Impact Assessments for Cultural Properties (2011). This is designed to inform the assessment of possible development impacts in relation to Outstanding Universal Value.

Route Options Appraisals – The Technical Appraisal Reports

82. We have appraised the information presented in the Technical Appraisal Report (TAR), concentrating on the Design Fix C options, D61 and D62 tunnel with Winterbourne Stoke bypass (Option1N and 1S) and F10 (at grade bypass south of the WHS).

Client Scheme Requirement Assessment (CSR) and Policy Objectives

83. This assessment looks at options in relation to the four client scheme requirements Transport, Economic Growth, Environment and Economy and Cultural Heritage (*to contribute to the conservation and enhancement of the WHS by improving access both within and to the site).* Each of the options is scored in relation to how strongly they align to meeting the objective.

84. It is clear from the TAR that option F10 scores higher than the other options against the cultural heritage objective, being strongly aligned to this objective. It does not introduce any new infrastructure within the boundaries of the WHS, and is a better fit with Wiltshire Core Strategy heritage objectives and WHS Management Plan. For these reasons, as well as the importance of protecting the OUV of the WHS, the archaeological service would have liked this option to have been included in the public consultation.

85. Both options promoted in the consultation would remove the existing A303 and the sight and sound of associated road noise from a key part of the WHS, providing a significant improvement to the setting of the WHS and allowing for better access. Both options will also allow for the reconnection of the Avenue which is currently severed by the A303.

Appraisal Summary Tables (ASTs)

86. These are summary scores coming out of the WEBTAG assessment criteria which includes economic, environmental (including historic environment) and social and financial objectives. In the historic environment and the WHS object the overall score for D61 and D62 are considered to have Neutral to Moderate benefit.

The Consultation Scheme D61 and D62: Issues and concerns

Eastern end of Proposed Scheme

87. This part of the Scheme, especially in the vicinity of Countess Roundabout is archaeologically sensitive. It is currently unclear what the impacts may be in terms of road widening, new access roads and other construction impacts. Once further design details have been developed this area will need to be assessed, including potential visual impacts on Vespasian's Camp.

Eastern Portal

88. We welcome the proposed location of the Eastern Portal to the East rather than West of the line of the Avenue. This is beneficial compared to the previously consented tunnel scheme. Although the immediate area for the proposed portal does not appear from the evaluation to contain highly significant archaeological remains (see evaluation section below), the surrounding area has many prehistoric burial mounds and ring ditches, both scheduled and unscheduled. The direct and indirect and visual impact of the construction of the Portal on these monuments will need to be assessed, as will the potential damage caused by any access road requirement and other construction impacts. The most concerning issue here is the proposed close proximity of the Portal to the Avenue and the visual impact the portal may have on the settling of not only the Avenue but the designated and undesignated barrows in this area and in particular the King Barrow Ridge Group. Careful design and mitigation will be required in this area.

Western Portal

89. The footprint of the proposed portal has been evaluated and no highly significant features found. There are linear features relating to probable prehistoric field systems and one substantial linear feature which are scheduled elsewhere. The issue for the portal is its location on a slightly elevated ridge position which will have an adverse visual impact on the nearby Normanton Barrow Group and the more distant Winterbourne Stoke Group to the North West. If a portal in this general area is to be acceptable it would have to be redesigned or mitigated to minimise these adverse visual impacts on attributes of OUV.

D61 Expressway, Bypass North of Winterbourne Stoke

90. No evaluation has been done on this proposed route within the WHS. Outside the WHS some assessment work was carried in 2001 North of Winterbourne Stoke in relation to the previous tunnel and bypass scheme. The route would have a direct impact on an upstanding prehistoric boundary earthwork which is a Scheduled Monument and considered to be of national significance, and then it goes through Diamond Wood, an area of high archaeological potential that has not been evaluated. Moreover, the route is projected to bisect the two recently discovered Neolithic long barrows which must be considered as an adverse impact on attributes of OUV.

91. As it runs westwards out of the WHS it passes though the remains of known ancient field system and the edge of settlement remains to the North East of Oatlands Hill. As it passes to the north of the A303 there are field systems and water meadows and a major water meadow system at the proposed River Till crossing. There is high

archaeological potential as the route passes just to the south of Parsonage Down close to an Iron Age settlement and a complex of prehistoric pits close to the proposed link into the A303.

92. If this proposed road is at grade there is still potential adverse visual impact within the WHS on the Lake and Normanton Down Barrow Groups. The proposed junction with the A360 1 km west of the WHS boundary is in an area of high archaeological potential (not evaluated yet) with a potential adverse visual impact on the Winterbourne Stoke Barrow Group.

D62 Expressway, Bypass South of Winterbourne Stoke

93. No archaeological evaluation has yet been undertaken for the proposed expressway leading out of the proposed western portal, either within or outside of the WHS. In general we know less about this route in terms of archaeology than the D61 route.

94. Within the WHS the route crosses a known upstanding prehistoric boundary earthwork which is a Scheduled Monument and considered to be of national significance. It also crosses an area of probable prehistoric field system and where it goes through Diamond Wood, an area of high archaeological potential. Outside of the WHS boundary the proposed road seems to avoid areas of known significant archaeology, passing south of Oatlands Hill although there are some linear features and a possible ring ditch along the route south of Winterbourne Stoke. There is a proposed new road junction just outside the WHS boundary within the Park area. This is just north of a complex of Iron Age enclosures and there is high potential for further remains in the area of the junction.

95. This route has the advantage over D61 being located in a lower area with less potential visual impact. However, if the road is at grade there is still potential adverse visual impact within the WHS on the Lake and Normanton Down Barrow Groups, and there is a potential adverse visual impact from the proposed junction with the A360.

96. With both of these proposed expressway routes we are concerned about how the large tunnel machinery is going to access the western portion of the WHS where there are lots of buried and upstanding archaeological remains. We would want to see details of this within the DCO applications along with the impact assessment of all temporary construction impacts.

Solstice Alignments and Dark Skies

97. None of the documents which accompany the non-statutory consultation consider the effects of the D61 and D62 on the astronomical element of the OUV of the Stonehenge part of the WHS. The significance of Stonehenge and associated monuments in relation to solstitial alignments is a key feature in the WHS nomination document and is recognised as an attribute of the OUV of the site. Policy 1e of the 2015 WHS Management Plan states the need to *minimise light pollution to avoid adverse impacts on the WHS, its setting and its attributes of OUV.*

98. The latest consideration of the Solstice alignments at Stonehenge by Clive Ruggles has suggested that it may be the winter sunset solstice alignment which is actually more significant than mid-summer sunrise. He has suggested that the approach to Stonehenge via the Avenue puts the viewer directly on the alignment of the Winter sunset, framed by the stones within the henge.

99. The alignments of both D61 and D62, from where they exit the western portal until they pass over Oatlands Hill, have the potential to affect this highly significant element of OUV, an element which has not been previously disturbed by the existing A303. In

particular, the proposed grade separated junction with the A360 on D62 is directly on the line of the Winter solstice and so has the potential to affect the view. Light from car headlights and any road lighting is also an issue that needs to be considered.

100. This highly significant element of OUV has not been considered in the documents submitted for the Non-Statutory consultation, and so it calls into question the overall slightly beneficial score given to these routes on this criteria.

101. On the whole D61 (North of Winterbourne Stoke) is less desirable in our view in terms of impact on the OUV. However, there are major issues with D62 (solstitial alignment, position of Western Portal, impact of expressway) that would need to be addressed as the scheme is developed.

Excavated Materials/Spoil from Tunnel

102. Whichever method of tunnel boring is used will result in a great quantity of spoil. The disposing of spoil to build up areas within the WHS may be difficult on heritage grounds, as may the disposing of it in archaeologically sensitive areas outside of the WHS, also we will need to have evaluation of areas for temporary storage of spoil.

<u>Archaeological Evaluation</u>

103. Some archaeological evaluation has started to be undertaken in relation to the proposed tunnel scheme but only within the WHS boundary. The evaluation has involved non-intrusive studies and surveys in the first instance including aerial photographic survey and geophysical surveys. Both magnetometer and Ground Penetrating Radar (GPR) techniques have been used in parts of the evaluated areas. Use has also been made of the results of recent archaeological research undertaken by Historic England in the southern part of the WHS (written reports pending).

104. To date trial trenching has been undertaken in three areas of the WHS which could be impacted by the proposed tunnel schemes. The location of the trenches in these areas have been guided by the results of the geophysical surveys. Area NE2 is just north of the A303 at the end of the WHS. Where the proposed location of the East Portal is proposed 27 trenches have been recently excavated (report pending). The only archaeologically significant feature found was an undated ditch which is likely to be part of a prehistoric field system as marked on the Historic Environment Record.

105. In the South West part of the WHS two further areas have had trial trenching. SW1 had 35 trenches and mainly located the remains of ditches (probably traces of prehistoric field systems). There was one previously known large linear feature known as a Wessex Linear, a Late Bronze age or early Iron Age boundary. This is the area that has been proposed for the location of the Western Portal.

106. SW2 is located close to the western boundary of the WHS (where part of the proposed expressway for D62) and had 32 trenches. The trenches identified some highly significant archaeological remains which are considered as attributes of OUV. It confirmed the presence of two Early Neolithic Long Barrows and a penannular ditched enclosure with two cremation burials dating to the Late Neolithic. The proposed Expressway for D61 is currently bisecting the two Long Barrows.

<u>Archaeological Evaluation: Further Requirements</u>

107. A considerable amount of archaeological evaluation, both within and outside of the WHS is still required before the submission of the DCO. We would advise that this is undertaken as early as possible so the results can be used to help influence the final

design of the Scheme that gets taken forward and will feed into the Environmental Assessments. The evaluation will need to include not only total coverage of the proposed expressways but also the proposed road junction areas outside of the WHS and all drainage areas, attenuation ponds, aquafer etc. We will also require all proposed construction impact such as access roads, compounds, temporary spoil storage areas to be evaluated in advance of the submission of the DCO.

Archaeological Assessments: Further Requirements

108. We would expect to see a full and detailed Environmental Statement submitted with the DCO covering all aspects of the historic environment. This should also include a full assessment on the impact of OUV carried out in accordance with the ICOMOS Guidance on Heritage Impact Assessments for Cultural Properties (2011). This assessment has not yet been done in relation to the Scheme.

109. Construction impacts and temporary impacts will need to be assessed in same way as permanent impacts (direct and indirect).

Summary of Archaeology and Historic Environment Issues

110. Wiltshire Council Archaeology Service over the last few months has worked in conjunction with other heritage agencies and Highways England in developing the option proposals. What we can say here is still outline and limited as detailed design of the scheme has not yet been done and the archaeological/historic environment evaluation and assessments are not completed.

111. It is clear that the removal of the A303 through the World Heritage Site (WHS) inherent in all of the assessed schemes will bring huge benefits for the centre of the WHS. With the proposed tunnel options D61 and D62 the position of the Eastern Portal to the east of the Avenue brings the benefit of being able to reunite the currently severed line of this important monument.

112. There are significant issues and risks with the proposed tunnel scheme for proposed options, D61 and D62. In their current form we consider both options have potential of adverse impacts on OUV which outweigh the benefits of the scheme especially in relation to the location of the western portal and expressway.

113. Either scheme would require a significant amount of further evaluation and assessment and would require a significant amount of archaeological mitigation both inside and outside of the WHS. This may have financial implications and impact on the timescale for delivery of the project and needs to be considered as part of ongoing evaluation/assessment/design work should the project go forward.

114. However, on present evidence it *may* be possible that with some re-design and mitigation the south of Winterbourne Stoke bypass option D62 may be considered *marginally beneficial* for heritage compared with D61 and the current baseline situation, but the following issues should be resolved prior to the DCO submission.

- The Eastern portal location and design developed to minimise proximity and visual impact on the Avenue and King Barrow Ridge
- The design and location of the Western portal, expressway and junctions are developed/amended to avoid the current predicted major adverse impact on heritage and outstanding universal value especially in relation to the Scheduled Barrow Groups and other attributes of OUV

- The expressway and junction alignments do not adversely impact on Solstitial alignments
- All required archaeological evaluation assessment within and outside WHS are completed in time to feed into the assessment work and submission of the DCO.
- Mitigation measures will be in place to offset potential adverse impact on OUV and other significant heritage assets.

IX. Built Heritage Considerations

115. The comments below highlight the elements of the historic built environment that may be affected by the proposed road schemes between Countess Roundabout and west of Winterbourne Stoke.

Countess Roundabout (A345) Flyover to Eastern Tunnel Entrance

116. The grade II* registered park of Amesbury Abbey (itself grade I listed), specifically the section known as Lords' Walk, abuts the A303 embankment by the footbridge about 500m east of the roundabout, and close to the start of the anticipated ramp of the flyover. The differing levels and limited intervisibility suggest that there would be little or no change to the setting of the RPG.

117. 10m NW of the roundabout lies Countess Farm, a group of six grade II listed buildings including the C17 farmhouse. The setting of these buildings has long been affected by the road's presence, but the scale of the flyover structure and its inevitably urban character is likely to have a significant, potentially overbearing, impact, and form a more solid physical and visual barrier between the farm and the town of Amesbury.

118. 35m S of the roundabout lies a grade II listed stone bridge over the Avon. This bridge lies in a corner between the wall of the park and the modern A345; its setting would be affected but I would suggest this to be at the lower end of 'less than substantial harm' (as defined by NPPF).

119. On the A345 roadside 120m S of the roundabout lies Diana's House, a grade II* listed former lodge to the Abbey. The northern outlook from this important building would be adversely affected, but not to a level of substantial harm to the listed building or its immediate setting.

120. Amesbury Conservation Area abuts the A303 along its southern side for a distance of 900m west of the roundabout, to the western edge of 'Vespasian's Camp'. All of this land is also within the Abbey's registered park, and contains several grade II* listed structures. The proposal appears to move the dual carriageway slightly further from the edge of the CA and RPG, before entering into the tunnel 400m to the west of the CA boundary, also about 400m to the north of the small village of West Amesbury which has its own CA and grade I listed W Amesbury House. There would be no additional adverse impacts on the designated built heritage assets, and there probably would be some benefits of noise reduction in West Amesbury. The removal of access to the A303 using Stonehenge Rd from the upper Woodford valley will presumably need to be addressed, although no proposal is shown.

121. Stonehenge Cottages. These early C20 thatched cottages (unlisted) lie on the N side of the current A303, and their setting would be much improved as the proposed tunnel would pass underneath them.

Winterbourne Stoke, Northern Bypass Option from Western Tunnel Entrance

122. The northern option crosses the A360 in open farmland, then the A303 northward and descends to the Till valley floor with embankments and a bridge, before cutting across fields to the NW of the village and rejoining the existing route. There are no known heritage assets whose setting would be adversely visually affected by this route. A good quality undesignated cartshed at Foredown Barn would be 550m from the new road, some 300m closer than currently, and brought into greater public view. The building may be worthy of listing, but the slightly increased impact on this isolated building would clearly be outweighed by other heritage benefits.

123. Winterbourne Stoke Conservation Area abuts the southern side of the A303, although in reality this is only to include the grounds of the grade II* Manor House and its curtilage structures, all in very close proximity to the existing road. The remainder of the CA lies to the south focused along Church St. The existing A303 has little direct impact on most of the CA, although it does limit local movement, and generates a level of noise – limited by reduced traffic speeds. The noise level of the new bypass could be significant in its impact on the relatively quiet nature of the CA at present, depending on the surfacing materials and detail of cuttings and embankments, although the increased distance from the edge of the CA would provide some mitigation. There would be a significant improvement in the visual setting of the Manor House.

Winterbourne Stoke, Southern Bypass Option from Western Tunnel Entrance

124. The southern option crosses the A360 and bisects a large historic landscape feature known as 'The Park' on C19 maps. The four-sided 35ha Park is currently in arable use, with a thick wooded boundary on each side. While not a built heritage asset, this is clearly a notable manmade landscape feature, possibly associated with the historic farms nearby, whose significance should be explored further if this route option is pursued.

125. The collection of farm buildings immediately to the west of The Park is entirely modern.

126. Asserton Farm, 400m S of proposed route, while containing no listed buildings, is largely C19. The primary impact on this site would be noise.

127. New bridge over Till, approx. 600m S of the southern boundary of Winterbourne Stoke CA, and new embankments heading NW to rejoin existing carriageway. The grade II* listed church, adjacent grade II Old Rectory and Church Cottage abut the southern CA boundary and can be clearly seen from the crossing points of the river and the Winterbourne Stoke/Berwick St James road. The land to the south of the CA is level and the road and bridge would clearly intrude into this rural setting, both visually and aurally.

128. 300m to the south of the bridge lies an unlisted thatched cottage (C19 or earlier), White Lodge, whose tranquil rural setting would be severely compromised.

129. Asserton House, a grade II listed building, lies approx. 450m to the south of this route.

130. The southern route passes about 450m to the N of Berwick St James CA. Currently the road noise from the A303 has little impact on the historic character of this CA, whereas the introduction of the dual-carriageway across the open landscape of the river valley would have a significant adverse visual and aural impact.

131. This option also offers significant improvements to the setting of the Manor House at the northern edge of the CA.

132. Therefore, in light of the above, the Northern bypass route would be the preferred option at the present time.

X. Flood Risk and Drainage Considerations

133. Wiltshire Council will have to give consent as Lead Local Flood Authority (LLFA) for ground water and land drainage after assessing the flood risk. Once the framework has been agreed it may be necessary to have the information peer reviewed via our consultants, which is subject to ongoing discussions with Highways England relating to methodology and costs.

134. The Environment Agency will approve some of the design for water quality, licensing etc., however the greater part of the consenting process will remain with Wiltshire Council.

135. Further information has been requested on the A303 scheme for ground water and drainage as there is only an outline plan available to date.

136. The Council needs to ensure that the temporary proposals and permanent solutions have adequately considered all flood and draining considerations, including how it will function once its constructed. It will be imperative to ensure that this scheme does not increase the flood risk anywhere else as a result.

XI. Procedural Issues and Next Steps

137. As a nationally significant infrastructure project, this scheme will be dealt with under the Development Consent Order (DCO) process. The role of the Council within this process is therefore as a statutory consultee. The Council has considered its position on a number of aspects as set out in this non-statutory consultation response. The Council wish to make clear to Highways England that it is fully committed to the DCO process, and supports this proposal in principle, but subject to the making of a objective balanced planning judgement in relation to the outputs of the assessments necessary to address the detailed comments set out in this consultation response. The Council asks that Highways England takes these comments into full consideration.

Wiltshire Police

Response ID ANON-BABJ-X64H-S

Submitted to **A303 Stonehenge**
Submitted on **2017-03-02 15:11:39**

Introduction

Name

Name:
Barnaby Appleton

Postcode

Postcode:
SN10 2DN

Email

Email address:
barnaby.appleton@wiltshire.pnn.police.uk

Postal address

Address:
Wiltshire Police
London Rd
Devizes

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Wiltshire Police as Traffic Management Officer

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
The key feature of the nominated proposal is the impact to the community of South Wiltshire is kept to a minimum. From an economic standpoint the proposed option optimises the most direct route across the county and potentially reduces the issue of "rat running" on adjacent roads, which with the other options may have been problematic.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly agree

Please provide any comments to support your answer for question 2:
The eastern portals location will be significant to avoid surface motorists line of sight to Stonehenge. Collision history on the A303's eastern approach to Stonehenge Bottom suggests that motorist may have been distracted by the appearance of the monument. By placing the this portal to the east of Stonehenge rd it would negate this issue. From an Archeological perspective it would join the two halves of the Avenue.

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:
As mentioned above this would be the most convenient location for the western portal to obviate any view of and from Stonehenge.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
From a purely Traffic Management perspective there is no significant favourite between the two options.

With regards to Option 1N there is the potential for conflict with the existing A303 during the construction phase. This option would necessitate the crossing of the existing A303 west of the A360 leading to potentially significant disruption, also requiring substantial traffic management to allow for the movement of construction traffic. Given it's higher elevation the northern option would be more visually impactive to the residents of Winterbourne Stoke.

Option 1S does not suffer with the same limitations as Option 1N. There wouldn't be any significant interaction with the existing A303 therefore avoiding any potential for substantial disruption during the construction phase. The topography of the landscape Option 1S is routed through reduces its visibility to the residents of both Winterbourne Stoke and Berwick St James.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
It's safe to assume that the obvious choice for this junction would be a flyover, principally to maintain the continuous flow of traffic on the A303.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
As with the A303/A345 junction the most obvious choice at this location would be a flyover, incorporating the required slip roads for access to the A360 and Winterbourne Stoke, again to maintain constant traffic flow on the A303

7. Do you have any other comments?

Q7:
With regards to the wider significance of the project it is essential that the Project Contractors and Highway England fully understand the impact on the Police and other Emergency Services.

Specifically there are two main areas of concern, although these are not exhaustive.

Construction Phase - What protocols will be in place regarding any incident that may require the Emergency Services(Tunnel Collapse, Fire, Environmental Protest etc.). This will have an impact on additional measures Wiltshire Police may have to put in place both from a financial and resourcing perspective. How will the consultation with the Emergency Services be managed prior to, and during the construction phase.

Completion Phase - What are the long term implications for the Emergency Services regarding a Major Fire, Major RTC, Tunnel collapse, Flooding, Terrorist Incident etc. What is the consideration for communications within the tunnel should the Emergency services be required to respond to an incident.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Winterbourne Stoke Parish Council

From: Clerk <clerk@winterbournestokepc.org.uk>
Sent: 02 March 2017 20:43
To: A303Stonehenge
Cc: pocorrespondence@dft.gsi.gov.uk; john.glen.mp@parliament.uk; Jim.OSullivan@highways.gsi.gov.uk; fleur.derhephilipe@wiltshire.gov.uk; annehenshaw@freeuk.com; ed.ltt@landor.co.uk; paul.clifton@bbc.co.uk; newsdesk@salisburyjournal.co.uk; Andy Shuttleworth; Sara Zacks-McGoldrick; Ian West; Richard Watts; Tony Zacks-McGoldrick; ian.west@wiltshire.gov.uk
Subject: Winterbourne Stoke Parish Council's Response to Highway England's A303 Stonehenge Scheme Consultation Process
Attachments: PC_Response_to_HEv1.pdf

Dear Highways England,
Please find attached Winterbourne Stoke Parish Council's response to Highway England's Consultation Process for the A303 Stonehenge Scheme. I would appreciate a confirmation of receipt.
Regards
James Carr
Clerk, Winterbourne Stoke Parish Council

M: +44 7973 366762
E: clerk@winterbournestokepc.org.uk
http://winterbournestokepc.org.uk/

Winterbourne Stoke Parish Council

c/o The Clerk
1 Cleeve View
Winterbourne Stoke
Salisbury
Wiltshire
SP3 4SY

Tel: 07973 366762
Email: clerk@winterbournestokepc.org.uk

Thursday, 2 March 2017

Highways England

By Email: A303Stonehenge@highwaysengland.co.uk

RESPONSE OF WINTERBOURNE STOKE PARISH COUNCIL: A303 STONEHENGE SCHEME PUBLIC CONSULTATION

To Whom It May Concern:

Winterbourne Stoke Parish Council are not statutory consultees in the A303 Stonehenge Scheme Public Consultation; a situation that many parishioners, and others living in the vicinity of the scheme, find both surprising and concerning. Indeed, we believe that failure to engage locally sets the tone for much that we have observed and experienced over the last two months. Whilst this may be normal practice for Highways England and its road schemes, we would suggest it falls far short of what might, or perhaps should, be regarded as "best practice".

It was clear to the Parish Council, from the time of our preview of the scheme, including plans for the two bypass options for our village, on Friday 13th January, that whilst a lot of time and effort had gone into identifying and optimising the proposed tunnel through at least part of the Stonehenge World Heritage Site, that significantly less effort appeared to have been given to the western section of the scheme that bypasses our village. Indeed, the initial reaction was that much more effort had been put into solving the needs of the long dead than the living. Cynical? Maybe; but heartfelt.

More importantly, none of the Highways England staff and their contractors were able to answer any questions in any depth. Although the presentation material was superficially slick, there was little of underlying substance to support it.

We were also concerned by the re-appearance of a southern route; an option all had believed was long dead and one that had been rejected as being unsuitable. We were worried that this would prove divisive in the village.

Following feedback to parish councillors after the first public session at the Manor Barn in Winterbourne Stoke on Saturday 14th January, it became clear that from being a village split in half by the current A303, we were fast becoming a village divided by the bypass options. Virtually all those parishioners who spoke to us, including some of those with little option in their choice of route preference because of their financial/ occupational interests, were concerned about the lack of detail provided to answer even that most basic of concerns: "How will each of the proposed bypass schemes affect me and my family."

All such questions were met with what can only be described as high level "waffle" regarding "overall corridor impact" and vague assurances to the effect that there was "little to choose" between the two routes. This may well be true at the highest level of aggregation and when trying to influence the Secretary of State, but totally irrelevant to parishioners concerned about the future of their parish, asking parochial questions and demanding parochial answers.

At our Parish Council Meeting on 16th January 2017, already aware of the deep divisions in the community, the lack of answers to these basic questions, and with a growing sense of unease, we felt that it would be inappropriate for the Parish Council to support either of the routes proposed, but we did need to support the community whichever route was ultimately selected. We undertook to do three things on behalf of the whole village: to seek answers to the key questions raised by parishioners; to establish the broad range of opinion across the village without asking individuals their preferences, but noting if they offered them and to hold a meeting to allow villagers to have a voice to air their concerns and to offer ideas for mitigation that might spark further thoughts that could be incorporated into individual responses. The Parish Council conducted a "door stepping" exercise to elicit responses designed to gauge the concerns of the parishioners without specifically asking the divisive question as to route preference.

This revealed that It wasn't just a simple binary question of north or south. As mentioned previously, some villagers must opt for one route or another because of the huge impact on their personal circumstances, others have opted for a route on the basis of their own understanding and local knowledge. Still others have no clear preference, or want to have a preference but can't get answers to their fairly basic questions from Highways England. Some, because they can't get answers, would prefer to stick with the status quo and some think the whole idea of a bypass is an enormous waste of public money and are happy with the A303 as it is. We learned that of the many villagers who want to go ahead with the bypass, a proportion are torn between the two routes, with their head saying one thing and their hearts saying the opposite. We were made aware of differences of opinion within families and even between husbands and wives. This only served to stiffen our resolve to not advocate one route in preference to another.

We sought further information and advice as to how the Parish Council could and might react to the public consultation on the A303 Scheme from the National Association of Local Councils. Much as anticipated, all roads point back to the Good Councillors Guide: http://www.nalc.gov.uk/library/publications/801-good-councillors-guide/file

"**The job of your council is to represent the interests of the whole community."**

…not just a part of it, not our view as a Parish Council, not the interests of the most vocal lobby group, but the interests of the whole community. Highways England will be well aware of the individual views of villagers from their personal responses; and thus the preferences of the village as a whole. As a Parish Council, we support and respect the interests of ALL our parishioners whatever they happen to be.

CONCERNS

Parishioners have a number of concerns that apply, irrespective of their route preferences. The most important of these has been the lack of real answers to their most basic of questions, the constant reference of Highways England staff back to the Technical Appraisal Review, which consistently fails to contain the detail claimed for it.

As of the date of this letter, we have still not been shown any information that could go any way to credibly answering the question of "how will each of the routes offered affect me?" for any properties within the parish. Although you have offered to make such information available to us, and to other individuals from within this and nearby parishes, this has not been done.

Noise - We have been told collectively and individually that certain information relating to noise is not collected at this stage of road development process, that it couldn't be done at this stage as there are two different schemes, etc, etc Even a superficial examination of the Highways England consultation website lends the lie to such a claim. A good example of this related to the Lower Thames Crossing at Dartford where the information being sought for our own scheme was presented in great detail - at the pre-consultation stage. For instance, the background noise levels in and around Dartford were clearly collected even at this early

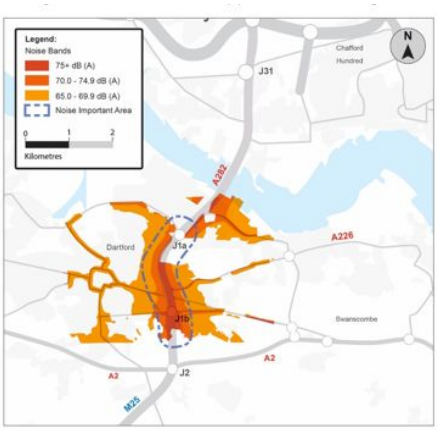


FIGURE 3.3 - EXISTING NOISE LEVELS ALONG THE A282 CORRIDOR AT DARTFORD

stage, despite there being at least 4 alternative road schemes being considered for public consultation. We regard claims that this approach was “anomalous” as somewhat risible in the circumstances. We would suggest this was an example of, if not “best practice”, certainly better practice than the approach taken for the A303 Stonehenge Scheme. We have also been told, repeatedly, that the methodologies employed are following non-statutory guidance. That is certainly true, but we would remind you of the landmark legal case relating to Department for Transport non-statutory guidance, Ali v Newham LBC (October 2012), where the High Court held that some non-statutory best practice guidance has a similar legal effect to statutory guidance. This may become an issue should whichever route be chose prove detrimental to the interests of villagers.

We have asked for details of the un-mitigated noise predictions for sensitive receivers within the village, as generated by the CRTN methodology and the mandated DMRB process and Highways England have failed to produce them. You have suggested that these could be re-calculated by us - which they could very easily - had you provided details of the assumptions you had used in your calculations. However, this information - an example of “best practice”, was for you to provide and put in the public domain to illustrate that you had done the job properly. You have not done so and so we can only conclude that Highways England, or those acting on your behalf, have not done the job properly. This view has been reinforced by the level of obfuscation we have met in seeking answers.

Noise is a major concern and **ALL** wanted to be assured that whichever route was eventually chosen, they would be no worse off than they were at present. There was concern that Highways England did not appear to have the slightest idea of current levels of noise within the village, nor the impact that the wind had on this. This was particularly noticeable in the south west of the village where sound levels were (subjectively) similar to those experienced closer to the A303 in Church Street.

Pollution - We asked for information relating to pollution arising from each of the suggested bypass routes. Again, we were told that this information isn’t produced at the level of granularity we were seeking and yet once again, it was just this level of detail that was presented for the Dartford scheme:

TABLE 4.1 - PREDICTED ANNUAL MEAN NO_2 CONCENTRATIONS AT SELECTED RECEPTORS WITHIN 200 METRES OF AFFECTED ROAD NETWORK AT SHORTLIST ROUTES 2 - 4

Property ID	Without Scheme (µg/m³) [1]	Routes 2, 3 and 4 WSL and ESL (µg/m³)[1]	Difference between Routes 2, 3 and 4 WSL and ESL and Without Scheme (µg/m³)	Approximate Number of Potentially Influenced Receptors [2]
R4	43.0	40.4	-2.6	<10
R8	39.0	37.2	-1.8	<50
R9	37.2	35.8 or 35.9	-1.3 or -1.4	<50
R12	43.7	38.1 or 38.2	-5.5 or -5.6	<50

[1] LTT=Long Term Trend. Predicted NO2 concentrations were adjusted using a gap factor based on the long term adjustment factor calculated by the Highways Agency's 'Interim Highways Agency Alternative Long Term Gap Analysis Calculator v1.1". All values reflect predicted concentrations for the future year 2025.

[2] Value reflects an approximated number of receptors which occur in the vicinity (and thereby may experience a similar effect of the scheme) as the modelled receptor.

There was unanimous concern that too little information had been provided to show the benefits (or decrements) in air quality that each scheme offered Winterbourne Stoke. A passive nitrous oxide sampling tube had been observed in south Church Street in summer 2016. The results of the sampling exercise had been promised to us in the autumn of 2016, by Highways England staff, but despite being promised, nothing has yet materialised.

We’ve Been Here Before - A real fear for many villagers is that once again, the whole bypass idea would cause a lot of acrimony, then fail as it so often had in the past. Many parishioners are desperate for a bypass and want it to happen, but not at any cost. Furthermore, a significant number of villagers had

expressed the view that they would prefer to maintain the status quo because they felt they had not been given sufficient information on which to base a rational choice, they didn't trust Highways England and it was a case of "better the devil you know".

Funding - There is continuing concern that regardless of the fine words of politicians, the money is not guaranteed beyond March 2020.

Models - Most villagers feel that there was a lack of detailed visual impressions of either bypass route (3D models, routes from multiple directions and ground level fly-thrus) to allow them to visualise how the road might appear. The video images provided were inconsistent with the stills images and some felt that the latter were particularly partisan in their outlook.

Flood - there was general disquiet that the bridging of the River Till, particularly in the case of the northern route, might exacerbate surface water flooding. It was noted that although borehole monitoring for the project had started in the vicinity of Cleeve View, it should be remembered that winter water levels at Tilshead were at a 4-year low and this needed to be brought to the attention of Highways England.

Impact on Footpaths and Byways - there was general concern that both schemes would lessen the amenity value of the footpaths and byways that led out from the village, but particular mention was made of those that led to the south, used by dog-walkers, runners and families from both Winterbourne Stoke and Berwick St James. Several walkers from the village expressed concern that Highways England had not considered footpath usage in the winter in assessing environmental impacts. Villagers had pointed out that some footpaths were more heavily used in winter than summer, because in summer, grazing cattle tended to deter their use.

How Was The Route Preference Being handled by HE? - was this going to be based on the quality of argument, or simply by the numbers of people voting for each route. Were the views of locals (ie Winterbourne Stoke) going to be given more weight than those from further afield. Would the archeological concerns over-ride those of the living? We had the opportunity to ask about this in detail with Highways England staff at a subsequent roadshow. Although we were encouraged to hear that an assessment would be made taking into consideration the origin of the comments and the strength of the argument, we were very concerned that Highways England appeared to have no methodology in place to do this.

Archeology - we were advised, on several occasions, that there was new archeology that would impact on the final siting of the new junction between the A303 bypass route and the A360. Despite asking for specific details of these finds we have received no further information. We discovered from the World Heritage Site Committee briefing that archaeological reports had indeed been prepared and peer reviewed but were being "sat on" by Arup Atkins. We find the idea that a contractor could be withholding any information that might influence the debate to be wholly unacceptable.

Why are the projected road levels so high? - There was considerable concern regarding the road heights of both schemes and these seemed to be largely driven by the need to get rid of spoil from the proposed tunnel. We have asked numerous Highways England staff how much spoil would be generated and received multiple answers that vary considerably. We appreciative that a drilled tunnel might generate a different amount of spoil to a face-cut tunnel, but it would be useful to know how much spoil would be generated by the tunnel, and if one of the schemes would 'lose' more of it than would the other. Highways England had advised some that the high embankments were needed to ensure the gradient of the road did not exceed 2% for the benefit of HGV's. Several villagers believed this argument was specious as the A303 has many steeper sections to the east and west, used by these same HGVs on long distance runs. In the light of both these points, some parishioners wonder if the reason the presentation material showed the road raised on embankments, whereas previous bypass schemes have sought to sink the A303 into green cuttings, was simply a cynical exercise on the part of Highways England. By first showing the road on high embankments, then at a later stage showing the use of the embankment soil to provide the obvious bunded mitigation would give the appearance of design "concession" to local concerns, but have been intended from the outset. We have seen nothing that would demur from such a view.

Why the difference in viaduct heights between the two schemes? - the viaduct in the northern scheme seems unrealistically high, certainly compared to earlier bypass proposals. As with the general road levels, this seems to be related to the need to get rid of tunnel spoil or, as some villagers have been told by Highways England staff, that this is because the Till valley is part of an SSI and the height was needed to ensure that the area under the viaduct experienced daylight. We consider the only factors that should govern the height of either viaduct should be the need to provide adequate space to accommodate the "once in 200 year" flood situation and the need to allow access by farm vehicles and machinery underneath it. For the reasons outlined above, we do not consider the need to maintain gradients at 2% to be sufficient reason to raise the height of a viaduct. Similarly, the loss of light to a very small section of the the Avon SSSI (there is no specific River Till SSI) would have a minimal ecological impact on the Till itself or the river system as a whole when compared to other activities such as water abstraction from the local aquifer.

Phosphatic Chalk - we are aware of the presence of a band of phosphatic chalk in the vicinity of Stonehenge and are concerned that spoil containing this material might be dumped within the run off margins of the River Till system. This applies regardless of the route finally selected. We are not aware that the ecological damage that this material could wreak within the River Till, then the Wylye and Avon downstream to Christchurch has been fully evaluated. We also note that the phosphatic chalk in question is, according to its finder, a source of radon gas - implying that the chalk itself contains not insignificant levels of uranium, thorium and radium. Whilst few houses in the area have cellars, so the direct problems associated with radon leaching experienced in Cornwall are unlikely, a bigger concern here is exposed phosphatic chalk producing radon and, more particularly, radon progeny that would bind to respirable dusts (such as the PM10 particles emitted by motor vehicles) and prove to be an enhanced health hazard by virtue of the radon progeny being alpha radiation emitters. We have yet to see any quantification of what the health impacts of this material might be, or any assurance that all such material would be safely removed from site.

Disruption during Construction - as a small village, there was considerable concern that we would be swamped by a major construction village on our doorsteps for several years. We wish to see what measures would be put in place for each of the two schemes.

A360 Access - there was general concern that this route must be maintained throughout the construction period, as it is the main access to and from Salisbury. We have not seen evidence of how this could be achieved for either scheme

Access to Winterbourne Stoke - there was general concern about the access to and from Winterbourne Stoke throughout the construction period. We would have expected to see, even at this stage, how this would be maintained throughout the construction period as each route would likely have different impacts on the village.

Time Frames - there was near unanimity that the time frame of the consultation was too short, particularly as so little detailed information had been provided.

MITIGATION MEASURES

We believe that there are many mitigation measures that could be brought to bear on both of the proposed route options. Most of them are already commonly applied to road building schemes in the UK and we find it quite bizarre that Highways England have failed to show these being employed and predicting their likely value in the documentation provided to the public as part of the consultation process. This would have greatly assisted the public in deciding on a route preference.

The most appropriate route - Villagers are concerned that the route decision is not only going to affect their lives, but also lives of villagers for generations to come. The best form of mitigation is to ensure the least detrimental route of the two on offer is the one adopted. However, the level of granularity in the appraisals and assessments presented to the public is such, that even a significant difference of the human impacts of the Winterbourne Stoke bypass options would get lost in the much bigger signal caused by the eastern half of the scheme. Consequently, many villagers have little confidence that Highways England understand the lack of sensitivity of their own methods.

Spoil - a considerable part of the discussion within the village has centred around a collective fear that the village and its environs are simply considered a dumping ground for the spoil from the Stonehenge tunnel. As mentioned previously, creative use of the spoil could maximise sound-proofing and eliminate a lot of the visual impact of both route proposals. The best way of achieving this would be to dig the routes into cuttings and use the spoil generated and the spoil from the tunnel to create large earth banks on either side of the carriageway; very similar to the way the A36 is separated from the village of Steeple Langford; a few miles to the south-west of Winterbourne Stoke. In the case of the northern scheme, earth banks, creatively employed, could be used to screen more of the proposed viaduct from the sightline of the northern edge of the village.

Acoustic measures - villagers are very aware that acoustic measures such as use of special road surfacing materials and acoustic barriers in addition to bunds are available and have been used in road schemes in the past. They are equally aware that such measures have been delayed on some road schemes and have failed to deliver the level of sound attenuation predicted for them on other schemes. They want assurances that, irrespective of the route selected, these measures would be put in place from the outset and assessed over the first year of operation and further mitigation measures put in place should the initial ones be found wanting. They would want a firm guarantee from government that mitigation measures required for a

Winterbourne Stoke bypass could not and would not be sacrificed to off-set cost over-runs on the eastern part of the scene

Visual Screening - villagers wanted similar levels of assurance that planting of hedgerows and other visual screening measures to hide the bypass from the village would be part of the scheme from the outset. It was also suggested that the planting of more mature specimens would aid either route to blend into its surroundings more readily.

Traffic Calming Measures - there was general concern that the design of both proposed junction options for the A303/A360, but particularly the one suggested for the northern route might, perversely, encourage rat-running along the High Street by north and southbound traffic transiting Shrewton and keen to avoid the Airman's Cross section of the A360. We have seen no proposals from Highways England regarding the sort of traffic calming measures that could be applied to the legacy section of the A303 that could be applied between the village and eastwards towards Longbarrow roundabout. However, we would suggest a narrowing of the entire route with build-outs and the creation of a protected footpath/bridleway/cyclepath, separated from the carriageway on the northern side of the current A303, together with a bridge over the northbound A360 at Longbarrow, to allow this non-vehicular traffic a safe entry point into the World Heritage Site.

Local Business Support & Sign-Posting - Whichever route is ultimately adopted, some local businesses will lose out. The village is keen to ensure that as much as possible is done to minimise the impact of the bypass to the village economy and to encourage forms of diversification that will benefit the local community and the World Heritage Site - hence the need for easy, safe and direct non-vehicular access to the WHS. The two businesses most likely to suffer as a result of the bypass are Stonehenge Filling Station and the Solstice Rest pub (formerly the Bell Inn). We would suggest that an obvious place to site a replacement filling station would be in the vicinity of the A303/A360 interchange. That would free up the service station site within the village for housing or some other purpose. It was felt critical that remaining local services and businesses, when disconnected from direct access to the A303, should, as a matter of course, be advertised by brown signage off the bypass. . One "off the wall" suggestion was that HE should purchase the pub and give it to the village as a community asset.

Local Facilities - the removal from use of the A303 at the western edge of the village at, and to the west of, the entrance to Scotland Lodge Farm raises the possibility that some of this flat land could be re-used for the benefit of the local community. We currently have no facilities for children over 12 years of age and teenagers and the land here might be ideal for the creation of a football pitch, etc.

CONCLUSION AND RECOMMENDATIONS

From the foregoing, the Parish Council are drawn to the inescapable conclusion that Highways England have failed, quite abjectly, to provide sufficient information, at an appropriate level of granularity, to allow any of our parishioners (save those who have a personal imperative) to come to an informed understanding as to the likely impacts of each of the route proposals on their lives. Consequently, it is completely unreasonable to expect anyone whose lives will be so directly affected to express an informed preference for either route.

We believe, from responses teased out of Highways England by ourselves, our MP Mr John Glen, and others, that much of the information, appraisal, assessment and prediction needed to answer these fundamental questions already exists and that essential baseline data could be gathered fairly swiftly if the instruction was given to do so. We are frankly appalled by the way we and our parishioners have and continue to be treated in this matter and wish that Highways England had put as much effort into presenting and answering these questions as they seem to be doing in withholding information.

In light of the above, we believe no rational decision can or should be taken on route selection until **ALL** the key concerns of our parishioners have been addressed, at a level of granularity that can illustrate the differences between, and impacts of, each route option.

Whilst we have no wish to stall the delivery of a much needed bypass for our village, something many of us have fought long and hard for over several decades, it is sometimes necessary to not simply "go along with the crowd". It is not, and must not be allowed to become a case of "a bypass at any cost".

Sometimes there is a need to draw a line in the sand and we think this is one such occasion. We call upon the Secretary of State for Transport to extend the consultation period until such time as Highways England have suitably addressed these fundamental questions and to defer route selection until one month after this has been done. This should not delay the overall scheme

unduly and might serve to prevent a disastrous mistake being made to the eternal detriment of Winterbourne Stoke and the Till Valley.

ADDENDUM

Following the drafting of the above response to the consultation process, representatives of Winterbourne Stoke and Shrewton Parish Councils and the Berwick St James Parish Meeting, met with Mr Derek Parody, Project Director for Highways England and Chris Jones, the stakeholder lead for the Arup/Atkins Consortium on 23rd February 2017. The purpose of this was to discuss and perhaps clarify some of the issues of concern. We very much appreciate the intercession of Mr John Glen MP, in calling for this opportunity

Highways England presented a limited dataset, for a single pollution indicator (NO_2). None of the data locations sampled lay any distance (more than 10 metres?) to the north of the current route of the A303. This unfortunately fails to capture the impact of the prevailing wind on the existing situation and calls into question the objectivity of the sampling undertaken. The data presented did show a minor trend that data points to the south of Winterbourne Stoke had levels of NO_2 slightly lower than those further north. That said, the approach to pollution modelling used is archaic and does not reflect the state of the art or the current views on pollutant risk. Whilst looking at single pollution indicators may have been acceptable in the past, it is less so today, with the emphasis being on both gases and particulates such as PM10 particles. The model used does not reflect terrain channeling, changes in surface roughness, or even basic meteorology and as a consequence seem hard to defend as being fit for purpose.

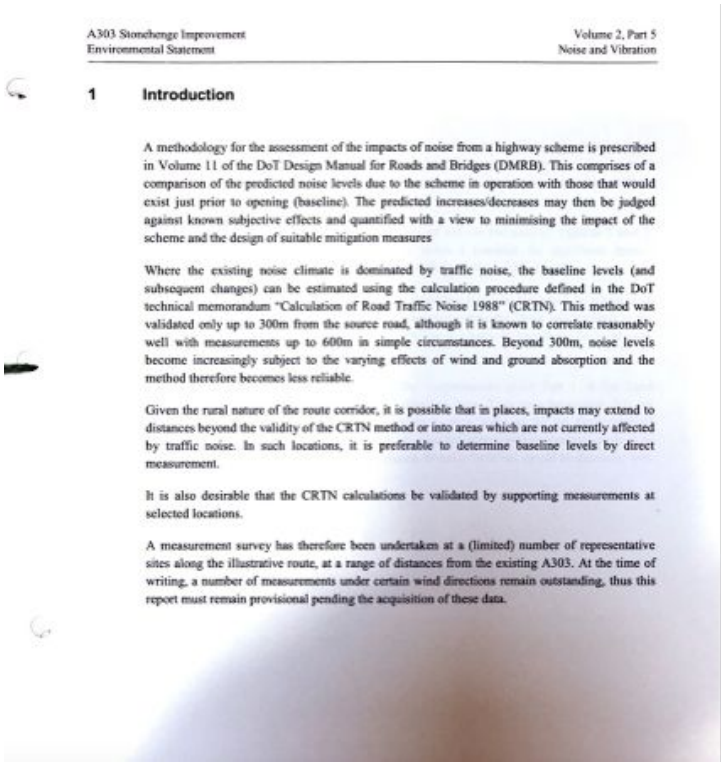
Highways England/Arup Atkins finally presented their noise predictions for sensitive receivers near the proposed routes, based on the use of CRTN. Whilst Highways England were very insistent that the CRTN process was followed, their interpretation of what was required appeared somewhat minimalist. For instance, the blocking of noise by buildings (facade effects) were omitted. Although these can be modelled in the CRTN methodology, it was ignored in this instance. This is likely to have distorted the noise predictions quite considerably. There were several other aspects of the use of CRTN which were questionable. The most concerning of these was the fact that no field sampling baseline data was collected in order to enable the modelling to be sanity tested and calibrated.

Worse still, no real attempt seems to have been made to make use of historical sampling data that could, in the very least, have assisted in this very purpose. Worryingly, for what is a company wholly owned by a Government department, Highways England claimed to no longer have a copy of the Environmental Impact Assessment conducted for the previous scheme in 2003, and which had been commissioned by their predecessor organisation at public expense. This claim alone should raise concerns. Needless to say, we were able to locate a publicly available copy of the EIA in a matter of a few minutes; a copy that would have been accessible to Highways England had they sought it. This calls into question the due diligence of Highways England and its contractors in seeking historic, but still valuable, data.

Highways England have refused to allow us to have a digital copy of the data they presented to show to our parishioners, on the grounds that neither we, nor the public, would be able to interpret the information “in context”. We find that claim both condescending and insulting; particularly as two of those attending had a professional background in relevant scientific disciplines. There was a secondary claim that the information could not be released as we were “being given privileged access”. We find this reaction quite perverse as many organisations and stakeholders had asked for and should have been provided with, the same information we were seeking. We pointed out to Highways England that, as government-owned company they were covered by the Government Chief Scientific Advisor’s Universal Ethical Code. Surprisingly, Highways England denied that this was the case. Whilst not mandatory, adherence to the code would be regarded as best practise to encourage active reflection among scientists and engineers on the implications and impacts of their work and to support communication between scientists/engineers and the public on complex and challenging issues. In other words, if Highways England genuinely believe that it was too difficult for anyone outside their organisation to understand the data they have generated, then it is incumbent on them to couch it, and any attendant caveats, in a form that is readily understandable. From the above, it would seem that Highways England have claimed that they have failed in this task; calling into question the entire consultation process.

We now learn that Highways England have sought an extension to a Freedom of Information Act request submitted on our behalf (https://www.whatdotheyknow.com/request/a303_stonehenge_scheme_predicted?nocache=incoming-944305#incoming-944305) citing that “the information requested must be considered under one of the exemptions to which the public interest test applies. This extra time is needed in order to make a determination as to the public interest.

Highways England have insisted that objections to, or criticisms of, the prescribed methods (eg CRTN, DMRB, etc), or the way in which they have been employed in this specific situation "will not be registered" within the consultation response appraisal. Whilst they claimed that such concerns will be captured "somehow", we have little confidence that will be the case, hence the extended distribution of our response.



A303 Stonehenge Improvement
Environmental Statement

Volume 2, Part 5
Noise and Vibration

1 Introduction

A methodology for the assessment of the impacts of noise from a highway scheme is prescribed in Volume 11 of the DoT Design Manual for Roads and Bridges (DMRB). This comprises of a comparison of the predicted noise levels due to the scheme in operation with those that would exist just prior to opening (baseline). The predicted increases/decreases may then be judged against known subjective effects and quantified with a view to minimising the impact of the scheme and the design of suitable mitigation measures

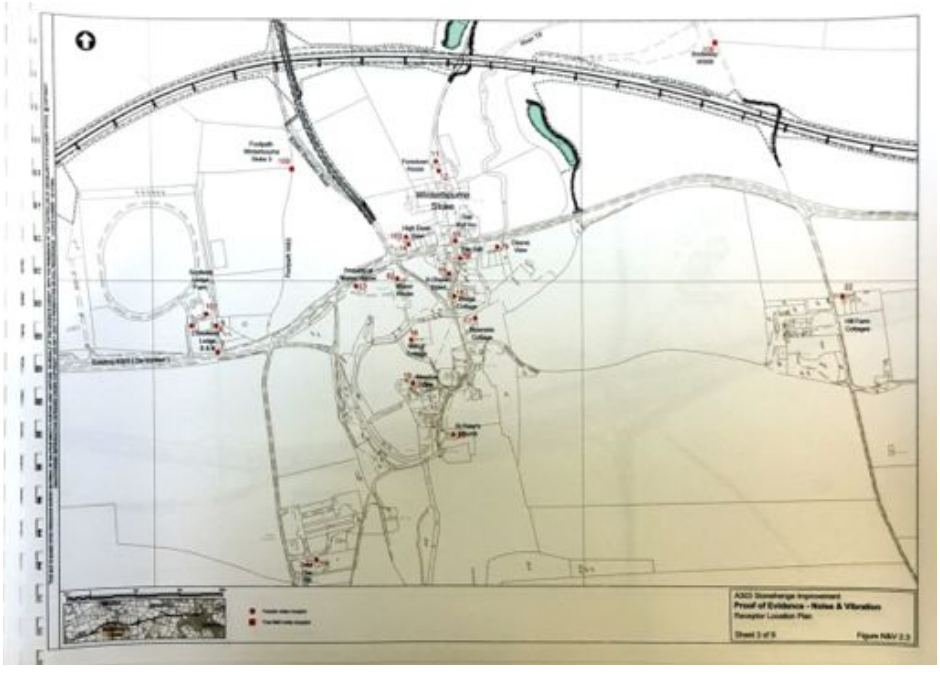
Where the existing noise climate is dominated by traffic noise, the baseline levels (and subsequent changes) can be estimated using the calculation procedure defined in the DoT technical memorandum "Calculation of Road Traffic Noise 1988" (CRTN). This method was validated only up to 300m from the source road, although it is known to correlate reasonably well with measurements up to 600m in simple circumstances. Beyond 300m, noise levels become increasingly subject to the varying effects of wind and ground absorption and the method therefore becomes less reliable.

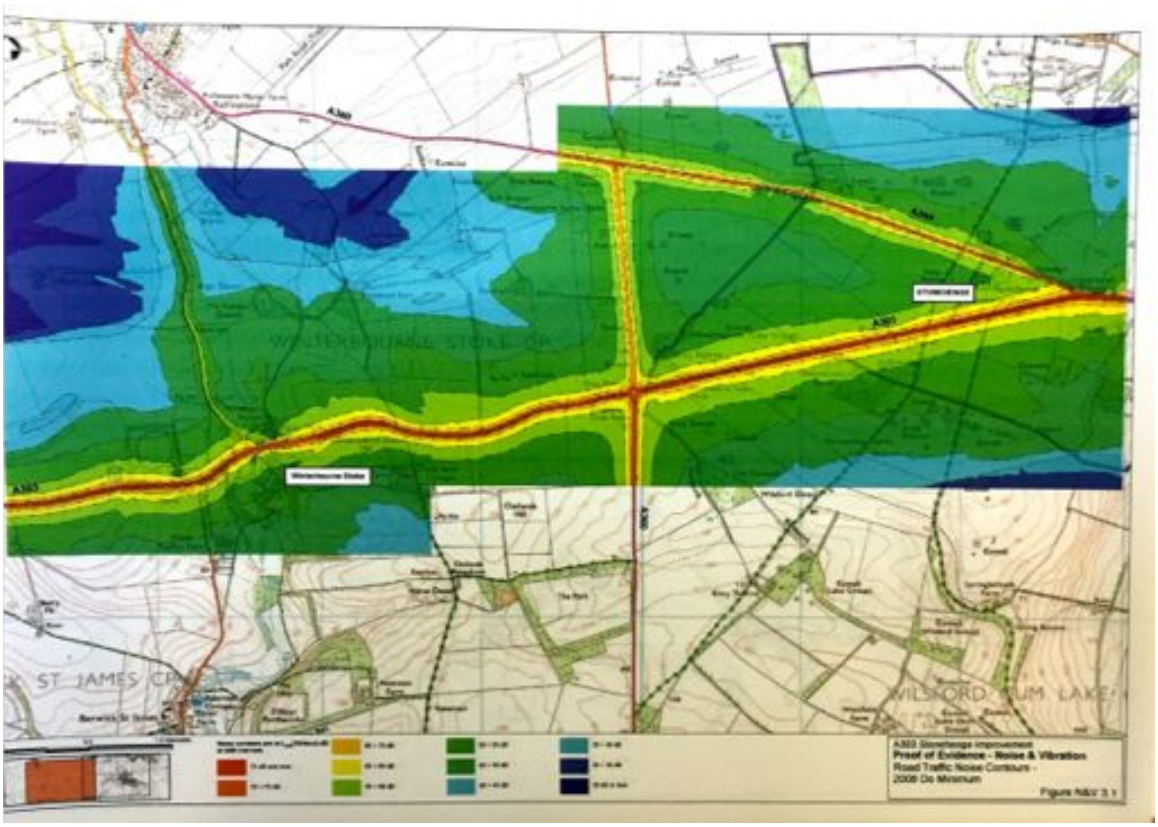
Given the rural nature of the route corridor, it is possible that in places, impacts may extend to distances beyond the validity of the CRTN method or into areas which are not currently affected by traffic noise. In such locations, it is preferable to determine baseline levels by direct measurement.

It is also desirable that the CRTN calculations be validated by supporting measurements at selected locations.

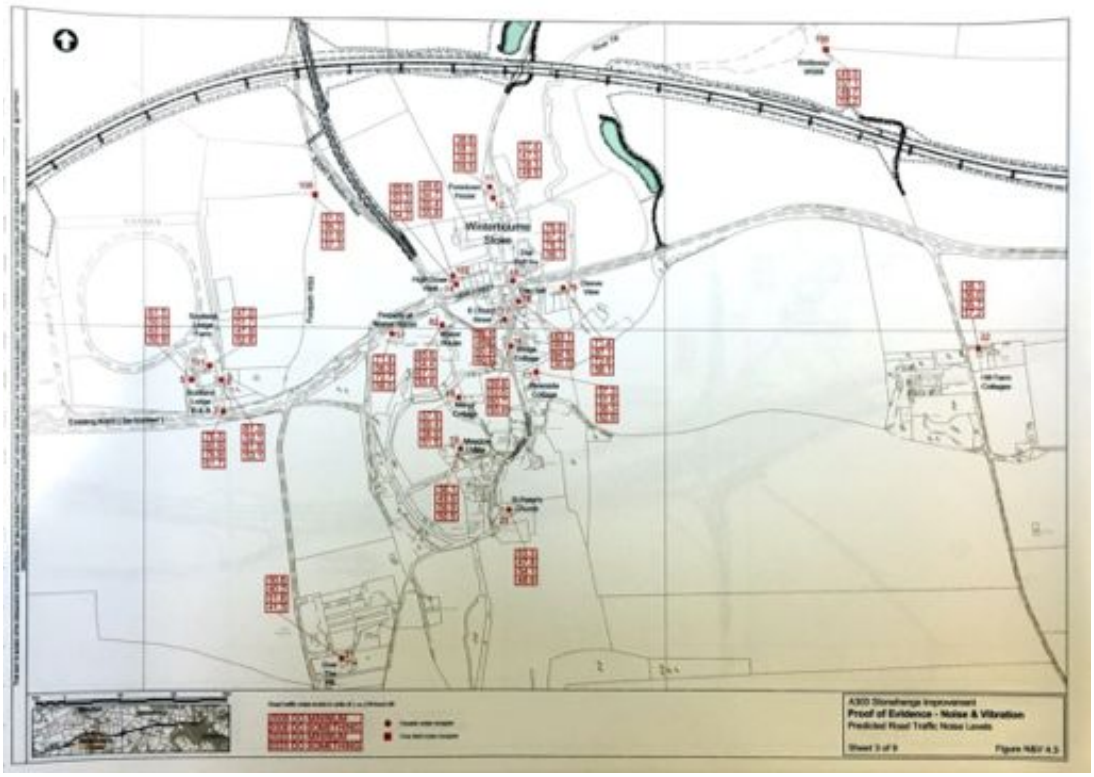
A measurement survey has therefore been undertaken at a (limited) number of representative sites along the illustrative route, at a range of distances from the existing A303. At the time of writing, a number of measurements under certain wind directions remain outstanding, thus this report must remain provisional pending the acquisition of these data.

We note that in the Introduction to the 2003 Environmental Statement Volume 2 Part 5, above, there were numerous caveats that support our contention that Highways England have failed to employ CRTN effectively and appropriately, including: "*It is desirable that the CRTN calculations be validated by supporting measurements at selected locations*". Or: "*At the time of writing. a number of measurements under certain wind directions remain outstanding…*" So, it is quite clear that best practise involves validating CRTN calculations against real world data and also means that the local meteorology needs to be





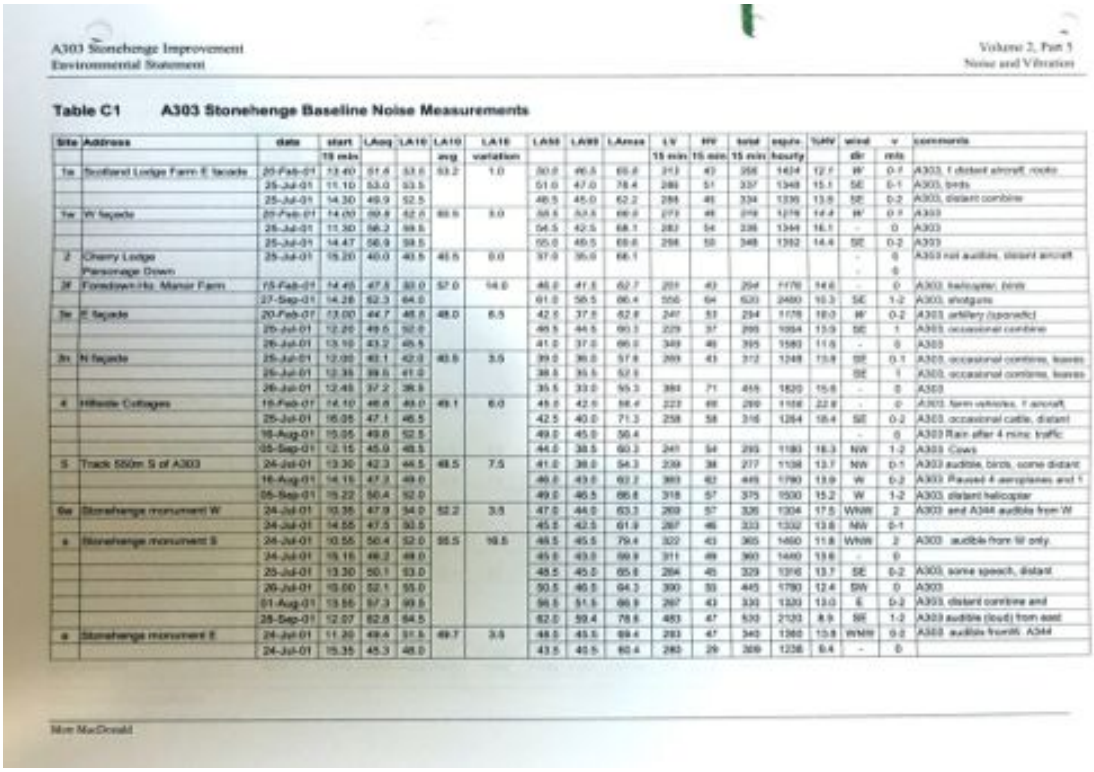
taken into account. The only shortcoming in the 2003 evaluation was the use of Met data from RAF Lyneham, almost 40km to the north.



It would have been useful had Highways England been able to produce information like that shown above to illustrate the baseline data as done here.

CRTN predictions should also have been produced to show the impact of each road scheme, as here:

and all this with the quality underpinning data absent in the consultation documentation.



A303 Stonehenge Improvement
Environmental Statement

Volume 2, Part 5
Noise and Vibration

Table C1 A303 Stonehenge Baseline Noise Measurements

Site	Address	date	start	LAeq	LA10	LA10	LA10	LA50	LA90	LAmax	LV	HV	total	equiv	%HV	wind	v	comments
			15 min			avg	variation				15 min	15 min	15 min	hourly		dir	mls	
1e	Scotland Lodge Farm E facade	20-Feb-01	13:40	51.6	53.5	53.2	1.0	50.0	46.5	65.6	313	43	356	1424	12.1	W	0-1	A303, f distant aircraft, rooks
		25-Jul-01	11:10	53.0	53.5			51.0	47.0	78.4	286	51	337	1348	15.1	SE	0-1	A303, birds
		25-Jul-01	14:30	49.9	52.5			48.5	45.0	62.2	286	48	334	1336	13.9	SE	0-2	A303, distant combine
1w	W facade	20-Feb-01	14:00	50.8	52.0	50.5	3.0	48.5	44.5	66.0	273	46	319	1276	14.4	W	0-1	A303
		25-Jul-01	11:30	56.2	58.5			54.5	42.5	68.1	283	54	336	1344	16.1	-	0	A303
		25-Jul-01	14:47	56.9	59.5			55.0	49.5	69.6	298	50	348	1392	14.4	SE	0-2	A303
2	Cherry Lodge Personage Down	25-Jul-01	15:20	46.0	46.5	46.5	0.0	37.0	35.0	66.1						- -	0 0	A303 not audible, distant aircraft
2f	Forestown Hs, Manor Farm	15-Feb-01	14:45	47.5	50.0	57.0	14.0	46.0	41.5	62.7	201	43	244	1176	14.6	-	0	A303, helicopter, birds
		27-Sep-01	14:28	52.3	54.0			51.0	50.5	66.4	556	64	620	2480	10.3	SE	1-2	A303, shotguns
3e	E facade	20-Feb-01	13:00	44.7	46.5	48.0	6.5	42.5	37.5	62.8	247	53	294	1176	18.0	W	0-2	A303, artillery (sporadic)
		25-Jul-01	12:20	49.5	52.0			46.5	44.5	60.3	229	37	266	1064	13.9	SE	1	A303, occasional combine
		26-Jul-01	13:10	43.2	45.5			41.0	37.0	66.0	349	46	395	1580	11.6	-	0	A303
3n	N facade	25-Jul-01	12:00	40.1	42.0	40.5	3.5	39.0	36.0	57.8	269	43	312	1248	13.8	SE	0-1	A303, occasional combine, leaves
		25-Jul-01	12:35	39.5	41.0			38.5	35.5	52.5						SE	1	A303, occasional combine, leaves
		26-Jul-01	12:48	37.2	38.5			35.5	33.0	55.3	380	71	455	1820	15.6	-	0	A303
4	Hillside Cottages	15-Feb-01	14:10	46.6	48.0	49.1	6.0	45.0	42.0	58.4	223	66	289	1156	22.8	-	0	A303, farm vehicles, f aircraft
		25-Jul-01	16:05	47.1	48.5			42.5	40.0	71.3	258	58	316	1264	18.4	SE	0-2	A303, occasional cattle, distant
		16-Aug-01	15:05	49.8	52.5			49.0	45.0	56.4						-	0	A303 Rain after 4 mins; traffic
		05-Sep-01	12:15	45.9	48.5			44.0	38.5	60.3	241	54	295	1180	18.3	NW	1-2	A303 Cows
5	Track 550m S of A303	24-Jul-01	13:30	42.3	44.5	48.5	7.5	41.0	38.0	54.3	239	38	277	1108	13.7	NW	0-1	A303 audible, birds, some distant
		16-Aug-01	14:15	47.3	49.0			46.0	43.0	62.2	365	62	445	1780	13.9	W	0-2	A303. Passed 4 aeroplanes and 1
		05-Sep-01	15:22	50.4	52.0			49.0	46.5	66.8	318	57	375	1500	15.2	W	1-2	A303, distant helicopter
6w	Stonehenge monument W	24-Jul-01	10:35	47.9	54.0	52.2	3.5	47.0	44.0	63.3	269	57	326	1304	17.5	WNW	2	A303 and A344 audible from W
		24-Jul-01	14:55	47.5	50.5			45.0	42.5	61.9	287	46	333	1332	13.8	NW	0-1	
6	Stonehenge monument S	24-Jul-01	10:55	50.4	52.0	55.5	16.5	48.5	45.5	79.4	322	43	365	1460	11.8	WNW	2	A303 audible from W only
		24-Jul-01	15:15	48.2	49.0			45.0	43.0	69.9	311	49	360	1440	13.6	-	0	
		25-Jul-01	13:30	50.1	53.0			48.5	45.0	65.8	284	45	329	1316	13.7	SE	0-2	A303, some speech, distant
		26-Jul-01	10:00	52.1	55.0			50.5	46.5	64.3	390	55	445	1780	12.4	SW	0	A303
		01-Aug-01	13:55	57.3	59.5			56.5	51.5	66.9	267	43	330	1320	13.0	E	0-2	A303, distant combine and
		25-Sep-01	12:07	62.8	64.5			62.0	59.4	78.6	483	47	530	2120	8.9	SE	1-2	A303 audible (loud) from east
8	Stonehenge monument E	24-Jul-01	11:20	49.4	51.5	49.7	3.5	48.0	45.5	69.4	283	47	340	1360	13.8	WNW	0-2	A303 audible from W, A344
		24-Jul-01	15:35	45.3	48.0			43.5	40.5	60.4	240	29	269	1236	9.4	-	0	

Mrs MacDonald

We will want assurances that Met data from sites closer to Winterbourne Stoke and Stonehenge will be used in any further work that is undertaken by Highways England. Perhaps weather stations at Boscombe Down or Larkhill, would be much more representative than Lyneham?

We raised the comparison of the A303 Stonehenge scheme with that for the Lower Thames Crossing (LTC); noting that the latter had provided much of the detail we were calling for in relation to the two bypass options for Winterbourne Stoke for several more options for the Lower Thames Crossing. Highways England were very dismissive of this, claiming that the two projects were at very different stages of comparison.

The flow diagram showing the current progress of the A303 Stonehenge Scheme is shown in the Technical Appraisal Review document:

Options identification

Process

A three stage process of options identification and sifting was followed to shortlist route options to be subsequently taken through the further more detailed appraisal to confirm the route options for consultation.

The three stages of options identification and sifting are outlined in Figure 1 below and were defined as follows:

a) Design Fix A – Initial Corridor Options appraisal to identify preferred corridor options.
b) Design Fix B – Development of possible route options within preferred corridors.
c) Design Fix C – Initial route options appraisal to identify options for further appraisal.

Figure 1 Options identification process

The equivalent flow diagram for the LTC scheme appears as follows:

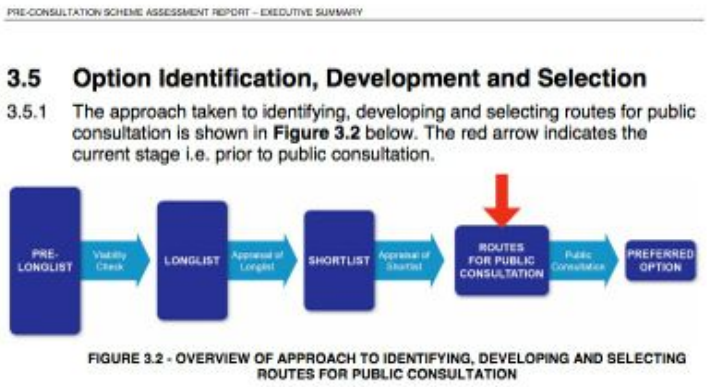


FIGURE 3.2 - OVERVIEW OF APPROACH TO IDENTIFYING, DEVELOPING AND SELECTING ROUTES FOR PUBLIC CONSULTATION

We think that the comparison is quite clear and unambiguous - a very different level of detail has been provided for the two schemes at the point the route options went out for public consultation. Once again, we were disappointed by the way Highways England so readily dismissed these concerns.

Highways England have denied that they or Arup/Atkins are “sitting on” outstanding archeological reports. Nevertheless, the reports remain outstanding. Consequently, it is not possible for villagers, who live close to the WHS, and many of whom take an active interest in it, to take an informed view as to their importance and vulnerability and weigh them against the interests of the living.

We raised the question of the reported belt of phosphatic chalk lying under the surface close to Stonehenge and our concerns regarding this; both in terms of the possible though unquantified hazard arising from radon emissions, but more predictably from the possible release of high levels of phosphate into the environment close to the sensitive sites at Parsonage Down and the Till Valley. We were rather taken aback by Highways England’s absolute dismissal of this and the science underpinning it. However, no evidence was presented that supported their contention.

Many villagers had believed, from the outset, that a primary driver behind both of the route selections was the need to get rid of a much of the tunnel spoil as possible in the course of building a bypass for Winterbourne Stoke. Highways England admitted that this was indeed the case. The reason for the inclusion of the southern route being the pressure being brought to bear by the archeological community to remove as much of the route as possible from areas of archeology in the WHS near the current Longbarrow roundabout. Neither answer inspires us with any confidence that the needs of Winterbourne Stoke are being considered fairly and reasonably in the consultation process.

One has to ask the question that if there is concern that a methodology being used to justify a new road scheme, or the way that method is being employed might be unfit for purpose, when would be an appropriate time to raise it? We believe, as a Parish Council, that this is very much the case here for the A303 Stonehenge scheme. We are concerned that the prescribed assessment and appraisal methods are demonstrably out-dated, unfit for purpose, or, in the case of the higher levels of aggregation (WEBTag), unproven and high risk.

We believe that these methods have not been used in accordance with industry best practise and in some circumstances have been used in ways that by design, or error, minimise differences between the two route options. We are fearful that when these errors are fed into the higher level models, these differences are further diluted and hidden from view.

The reaction of Highways England when challenged on this is reminiscent of the Roman Inquisition’s reaction to Galileo Galilei’s views on heliocentrism. No matter how often the authorities insisted their view was correct and that the sun revolves around the earth, Gallileo remained correct in his view and right to challenge them: "E pur si muove” (…and yet it moves!). On a scheme of such national and international importance, it is critical that DfT have independent review of ALL the methods used by Highways England on their behalf and have independent assurance that they have been correctly employed in this case. Highways England must not be allowed to act as judge and jury in their own trial, which seems to be the case at the moment.

It was and is incumbent on Highways England to provide the answers demanded by local villagers, in a way that is understandable and that addresses their concerns in an objective and fair manner. This has not yet been done and consequently there is little reason for us to change our initial recommendation that the consultation period be delayed/extended and no route selection made, until this has been achieved.

Yours sincerely,

Mr JH Carr

Clerk to Winterbourne Stoke Parish Council

Cc.

Chris Grayling MP, Secretary of State for Transport

John Glen MP

Jim O'Sullivan, CEO Highways England

Fleur de Rhé-Philipe, Wiltshire Council

Ian West, Wiltshire Councillor for Till and Wylye Valley

Anne Henshaw, Council for the Protection of Rural England Wiltshire

Andrew Forster, Local Transport Today

Paul Clifton, BBC

Salisbury Journal

Winterbourne Stoke Parish Councillors

Woodford Parish Council

Response ID ANON-BABJ-X671-5

Submitted to **A303 Stonehenge**
Submitted on **2017-02-20 13:04:35**

Introduction

Name

Name:
Richard Soar

Postcode

Postcode:
SP4 6NW

Email

Email address:
soar@cwgsy.net

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Woodford Parish Council, Salisbury

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
Woodford Parish Council believe there are benefits to be had from relieving the regular serious traffic congestion on this section of the A303. There will be benefits to local businesses and jobs and local roads will be relieved of traffic that uses minor roads to bypass congestion at peak flow times.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:
We believe that the closure of the Stonehenge Road slip road leading West at the top of the C42 onto the A303 will also discourage through traffic from using local roads.

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:
Clearly this Portal construction has the potential to disrupt existing archaeology within this important part of the Stonehenge World Heritage Site and some local residents have expressed concerns in this respect. We understand however that both the National Trust and English Heritage have given tentative support and will oversee this aspect of the final portal siting.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
We believe that the Northern bypass will create far less disruption and intrusion to the communities of Winterbourne Stoke and Berwick St James and would create less noise pollution. However, this option includes a junction East of Winterbourne Stoke with the A303 located on the old A303. We strongly believe that this is not the optimum position and that this junction should connect directly to the A360 as it does with the Southern route option. Our reasons are that there is

currently very substantial housing development taking place just North of Salisbury on the A360 and East of Wilton. Much of the traffic from these developments will need easy access to the A303. We believe that there is a serious danger that for vehicles wishing to travel East on the A303, if this traffic has to take a longer route and travel West to access the proposed junction, then they are likely to take the shorter options which are to cut through the Woodford Valley roads to the Countess Roundabout or Solstice Park junctions at Amesbury perpetuating the 'rat-run' problems that currently exist when there is heavy traffic on the A303.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
It would seem that because of the topography and proximity to the River Avon an A303 flyover would be the most practical solution. This would no doubt have some impact on local properties, but the alternative of a flyover of the A345 above the A303 might have even greater impact as additional land would be required necessitating compulsory purchase. In any event the present roundabout design seems to have already enclosed land that would be needed for a flyover/flyunder.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Please see answer to Question 4

7. Do you have any other comments?

Q7:
The conclusion at the end of Step 4 of the development of the current Proposal outlined in the Public Consultation Booklet on Page 33 & 34 we believe quite rightly discards Option 2 as an alternative to the tunnel for a number of very valid reasons. Woodford Parish Council STRONGLY supports the reasons given for discarding this Option and would very vigorously oppose any reintroduction of this alternative route should for any reason the current Tunnel Proposal not come to fruition.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

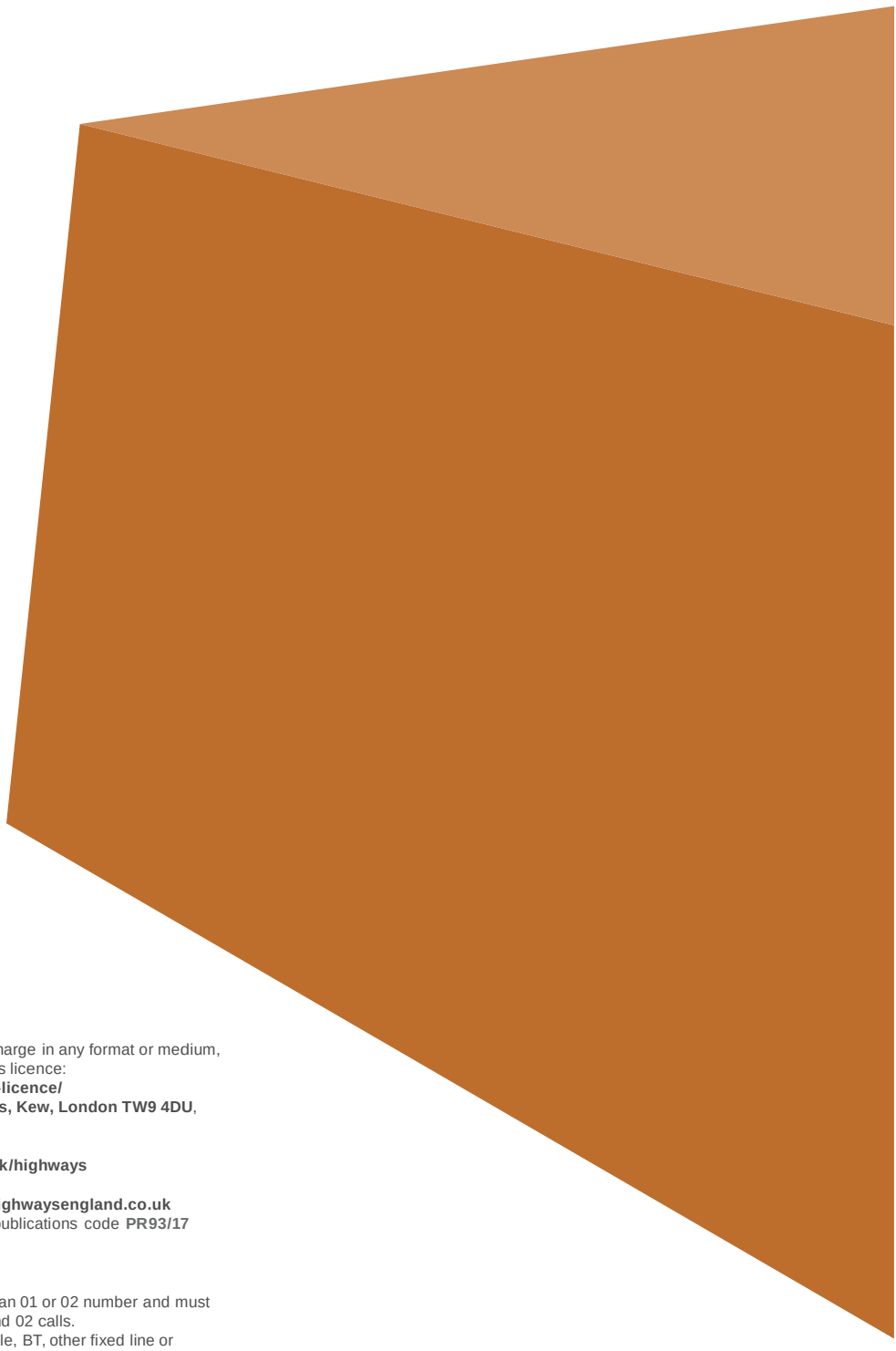
Local authority

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
All good. Very helpful information and responses to questions provided in particular by Andrew Alcorn at local information events.

If you need help accessing this or any other Highways England information, please call **0300 123 5000** and we will help you.



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If you have any enquiries about this publication email **info@highwaysengland.co.uk** or call **0300 123 5000***. Please quote the Highways England publications code **PR93/17**

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Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ
Highways England Company Limited registered in England and Wales number 09346363