

2nd November 2018

Richard Price
National Infrastructure Case Manager
The Planning Inspectorate
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BS1 6PN

Highways and Transport
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Your ref: TR010025

Our ref:

Dear Mr Price,

Re: Application by Highways England for an Order Granting Development Consent for the A303 Amesbury to Berwick Down and Request for Adequacy of Consultation Representation

Thank you for your letter dated 19th October informing us of Highways England's Development Consent Order application for the A303 Amesbury to Berwick Down (Stonehenge) scheme on 19th October and requesting an Adequacy of Consultation Representation.

In terms of the Adequacy of Consultation Representation, it is acknowledged that Wiltshire Council, as the Host Authority, has been asked to consider whether Highways England has complied, in relation to the application, with the following duties:

1. Duty to consult – Planning Act 2008 (PA2008) – Section 42
2. Duty to consult the local community – PA2008 – Section 47
3. Duty to publicise – PA2008 – Section 48

In considering its assessment, Wiltshire Council has reviewed the Consultation Report prepared by Highways England and submitted as Volume 5 of the DCO Application, its records of communications received from Highways England during the pre-application stage, records of representations submitted to the Council and received from members of the public during the pre-application stage relating to consultation activities and the relevant legislation and recommended guidance on consultation.

Highways England conducted a non-statutory, statutory and supplementary public consultation for this scheme. The approach and outcomes from the three consultations are reported in Highways England's Consultation Report. The Council acknowledges that the approach to public consultation for the A303 Stonehenge scheme was broadly similar and therefore has limited this review to the statutory consultation phase only.

PA2008 – Section 42 – Duty to Consult

Wiltshire Council notes that the Consultation Report states that prescribed consultees (S42(1)(a)) and relevant local authorities (S42(1)(b)) were sent a letter on 6th February 2018 informing them of the start of the statutory consultation. Included within this letter was a consultation booklet, leaflet, response form and a copy of the S48 notice. It is further noted that the Report states that a letter was sent on 20th March with an updated S48 notice and leaflet providing notification that the deadline for responses to the consultation had been extended to 23rd April 2018. The Council can confirm that it received these communications.

The Council notes the omission with respect to Oxfordshire County Council highlighted within the Consultation Report. It is further acknowledged that on identification, as stipulated within the Consultation Report, the appropriate communications were sent and a response to the consultation was received from Oxfordshire County Council for the statutory consultation.

With respect to Highways England's consultation with owners, lessees, tenants, occupiers and people with an interest in land (under Section 42 (d) of the Planning Act 2008), the Council notes the information provided within the Consultation Report. Wiltshire Council can only comment from its position as a landowner and party with land interests. It is confirmed that two Land Interests Questionnaires were received during the pre-application phase requesting confirmation of our ownership / interests in various parcels of land within the vicinity of the Scheme. One of which has been responded to and the other response will be submitted shortly.

PA2008 – Section 47 – Duty to Consult the Local Community

Following a meeting with the Council's Community Engagement Manager for Amesbury on 18th October 2017, Highways England sought informal feedback from the Council on the draft Statement of Community Consultation (SoCC) on 19th October 2017. The Council's initial comments were provided on 2nd November 2017. On 23rd November, the Council received a revised SoCC along with a request for its formal comments by 22nd December. The Council responded on 18th December and the main points raised in its response to the SoCC were:

- Extending the number and location of public information events planned to incorporate those Area Board areas which will be directly impacted by the A303 corridor improvements, but which fall outside of the immediate scheme area
- Use of the Council's buildings for consultation display materials and "Our Community Matters" webpage to further promote the consultation and optimise community awareness
- Ensure town and parish councils, community facilities and village halls within the scheme locality were provided with consultation material for display
- Clearer information on the range of methods available for submitting comments / responses to the consultation, with the provision of the appropriate contact details
- Ensuring that all relevant and supporting technical information is available for review by the public upon request during the consultation period
- Addition of educational establishment to help target hard to reach young people
- Consideration of an extension to the proposed length of consultation period.

The majority of requested amendments were incorporated into the published SoCC, as outlined within Appendix C7 of the Consultation Report. As such, the Council is satisfied that its views were adequately considered.

The consultation period was originally scheduled for 8 weeks (8th February to 6th April), however due to heavy snowfall within Wiltshire in March 2018, two public information events were curtailed or cancelled. Highways England liaised with the Council and it was agreed that these events would be re-arranged and the consultation period extended until 23rd April (10 weeks) to ensure people had sufficient time to submit their views on the proposals. This resulted in a revised SoCC being published.

The Consultation Report outlines how Highways England consulted with the local community, general public, statutory consultees and other relevant stakeholders on its proposals. This includes copies of communications, statutory notices and adverts. Wiltshire Council's assessment of the extent to which Highways England adhered to the commitments made in the SoCC (original and revised) is outlined in the following table:

Activity	SoCC Commitment	Council's Assessment
Public Information Events	Public information events will be held	14 public information events were held in the surrounding local area and further afield across the County and in London. Two events were re-arranged due to adverse weather as notified in the revised SoCC.
Scheme Website	A full summary of the Scheme, copies of the supporting project documents and a response form will be provided on a dedicated project website	A dedicated project website was set-up
Scheme Leaflet	A scheme leaflet and details of the planned public information events will be delivered to homes and businesses in the locality of the Scheme at the start of the consultation period. Copies will also be provided to the Parish Clerks for inclusion on community notice boards	A scheme leaflet with details of the planned public information events was distributed as planned. This included the Parish Clerks, unless expressly requested otherwise.
Council and Community Area Forum Briefings	Local council officers and members and community / area forums within close proximity of the Scheme will be offered briefings to discuss the proposal	The Council confirms that offers for briefings were made with a number of such meetings subsequently arranged and delivered within the consultation period
Stakeholder Forum Briefings and Groups	When invited, and where possible to do so, the scheme team will attend meetings of local community groups affected by the Scheme	Highways England delivered presentations to Wiltshire Council councillors, 9 Parish Councils and four Area Boards within the consultation period

Activity	SoCC Commitment	Council's Assessment
Ad Hoc Meetings	Meetings with residents, businesses and interest groups about the Scheme in general or particular issues can be arranged upon request	A community forum was established which first met in February 2018 and whilst held during the supplementary consultation, an issue specific meeting was organised with respect to public rights of way with interested community groups
Media	<p>The consultation will be advertised in local newspapers the Wiltshire Gazette and Herald, Salisbury Journal and for at least two successive weeks and once in the Wiltshire Times and Stonehenge Trader and once in the national newspapers (The Times and The Guardian) and the London Gazette.</p> <p>In addition adverts will be placed in local newspapers ahead of the launch of the consultation and reminders will be placed ahead of the public information events. Press releases providing details of the consultation and how the community and other interested parties can participate will be issued.</p>	<p>Notices were placed in local and national newspapers. Adverts were placed in local newspapers and press releases were issued during the consultation period. This was undertaken for both the original and revised SoCC. The consultation was also extensively covered on local radio stations and news channels, and the BBC local news web pages. However, Highways England omitted to advertise within the Stonehenge Trader publication. Whilst this is disappointing and regrettable, Wiltshire Council is of the view when considering the full range of promotional activities undertaken, the overall penetration for community awareness was sufficient, taking into account that the Salisbury Journal covers the same circulation area as the Stonehenge Trader.</p>
Social Media	The consultation will be advertised on Twitter. We will also provide information about the consultation to Wiltshire Council's "Our Community Matters" for them to include on the community blog pages	<p>The scheme had its own dedicated Twitter channel and Wiltshire Council promoted the consultation through its "Our Community Matters" site. Additionally, Highways England procured adverts promoting the consultation on Facebook and Instagram during the extension to the consultation period.</p>
Education	We will offer to attend Stonehenge School with a view to providing information about the consultation	Highways England were in contact with the school but were unable to agree a convenient date to visit
Deposit and Information Points	Information about the proposed Scheme including this SoCC, the PEI Report, the consultation	Ten public libraries and public buildings were used as deposit points, where consultation forms

Activity	SoCC Commitment	Council's Assessment
	booklet, response form and other relevant documents will be available online and at the deposit locations. In addition, consultation booklets and response forms will be available throughout the consultation at the specified community locations	and consultation documentation were available to be viewed in hard copy. Additionally, five health facilities and the Stonehenge Visitor Centre were utilised for members of the public to pick up consultation booklets and response forms.
Comments on Consultation	<p>Comments on the proposals can be made by:</p> <ul style="list-style-type: none"> • Completing the consultation response form • Alternatively a paper copy can be printed from the webpage or requested free of charge • Written responses can then be submitted by email and by post using the scheme email address or freepost address 	The Council confirms Highways England adopted these methods for receipt of comments during the statutory consultation
Provision of Information	<ul style="list-style-type: none"> • All of the consultation material will be available to view free of charge on the Scheme website or at the library locations listed • A single set of papers copies of selected documentation will be provided free of charge. A digital copy on a USB drive will be supplied free of charge through the post • If you do not have access to a computer a printed copy of the scheme plans and PEI reports can be sent to you if requested at a charge 	<p>The Council can confirm that the specified consultation material was available to view free of charge on the scheme website and at the library and Council buildings locations specified.</p> <p>Whilst we have no direct knowledge of provision of hard copy information by Highways England direct to those who requested it, we assume that this commitment would have been honoured as indicated within the Consultation Report.</p>
Consultation Report	Following the consultation period, Highways England will review all of the responses received and produce a consultation report. This report will summarise the views and comments received and outline how these have been taken into consideration in further	The Council confirms that Highways England prepared the Consultation Report as included at Volume 5 of the DCO application. Furthermore, the Council notes that those views expressed directly to them during the consultation period by members of the public on behalf of non-statutory groups and

Activity	SoCC Commitment	Council's Assessment
	developing the Scheme.	/ or organisations, have been included within the comments contained within the Consultation Report.

In addition to the activities outlined above, mobile adverts were driven along the A303 route to inform local people and road users of the consultation and information stands were established at service stations close to the Scheme over the Easter bank holiday weekend. Several parishes also informed residents of the consultation through inclusion within their parish newsletters.

As highlighted above, Wiltshire Council considers that Highways England has fully complied with Section 47 of PA2008 subsections (1) to (6). With regard to subsection (7), whilst Highways England omitted to advertise in the Stonehenge Trader publication and therefore the statutory consultation was not conducted in full compliance with the proposals set out in the statement, on balance and taking into account the full range of promotional activities undertaken, the Council is of the view that the overall penetration for community awareness of the statutory consultation was sufficient.

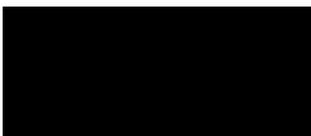
PA2008 – Section 48 – Duty to Publicise

In relation to Section 48 of the Act, the details of the publicity of the relevant notices of the proposed application in accordance with Regulation 4 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) is set out in the Consultation Report and is noted.

Adequacy of Community Consultation Conclusion

As acknowledged within the Consultation Report and referenced in our response above, Highways England made a few omissions during the statutory consultation. However, on balance, the Council considers Highways England's consultation to be adequate in line with Section 42, 47 and 48 of the 2008 Planning Act.

Yours sincerely,



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