

A303 Stonehenge

Amesbury to Berwick Down

Relevant Representations Report

APFP Regulation 5(2)(q)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009

April 2019



Table of Contents

Chapter		Pages
1	Introduction	1-3
2	Alternatives	2-1
3	Needs and Benefits	3-1
4	Draft Development Consent Order, Consultation and Process	4-1
5	Design – Countess Junction, Green Bridge No. 4, Longbarrow Junction and River Till Viaduct	5-1
6	Noise and Vibration and Air Quality, Dust and Other Emissions	6-1
7	Biodiversity, Biological Environment and Ecology	7-1
8	Environmental Impact Assessment	8-1
9	Landscape and Visual Effects and Design	9-1
10	Flood Risk, Groundwater Protection, Geology and Land Contamination	10-1
11	Heritage and Historic Environment	11-1
12	Health and Wellbeing, Socio-Economic Effects and Other Environment	12-1
13	Agriculture, Land and Compulsory Acquisition	13-1
14	Public Rights of Way	14-1
15	Tunnel	15-1
16	Construction and Waste and Materials Management	16-1
17	Traffic, Transportation and Operations and Maintenance	17-1
18	Scheme Sections – Eastern, Central and Western	18-1
19	Wiltshire Council (RR-2365)	19-1
20	Environment Agency (RR-2060)	20-1
21	English Heritage Trust (RR-1725)	21-1
22	Historic England (RR-1897)	22-1
23	National Trust (RR-2344)	23-1
24	Natural England (RR-2253)	24-1
25	Winterbourne Stoke Parish Council (RR-1400)	25-1
26	National Farmers Union (RR-2252)	26-1
27	RSPB (RR-0587)	27-1

List of Tables

Table 2-1: Alternatives	2-1
Table 3-1: Needs and benefits	3-1
Table 4-1: Draft Development Consent Order, Consultation and Process	4-1
Table 5-1: Design – Countess Junction, Green Bridge No.4, Longbarrow Junction and River Till Viaduct.....	5-1
Table 6-1: Noise and Vibration and Air Quality, Dust and Other Emissions.....	6-1
Table 7-1: Biodiversity, Biological Environment and Ecology	7-1
Table 8-1: Environmental Impact Assessment.....	8-1
Table 9-1: Landscape and Visual Effects and Design	9-1
Table 10-1: Flood Risk, Groundwater Protection, Geology and Land Contamination.....	10-1
Table 11-1: Heritage and Historic Environment	11-1
Table 12-1: Health and Wellbeing, Socio-Economic Effects and Other Environment.....	12-1
Table 13-1: Agriculture, Land and Compulsory Acquisition	13-1
Table 14-1: Public Rights of Way.....	14-1
Table 15-1: Tunnel.....	15-1
Table 16-1: Construction and Waste and Materials Management	16-1
Table 17-1: Traffic, Transportation and Operations and Maintenance	17-1
Table 18-1: Scheme Sections – Eastern, Central and Western.....	18-1
Table 19-1: Wiltshire Council	19-1
Table 20-1: Environment Agency.....	20-1
Table 21-1: English Heritage Trust	21-1
Table 22-1: Historic England.....	22-1
Table 23-1: National Trust	23-1
Table 24-1: Natural England	24-1
Table 25-1: Winterbourne Stoke Parish Council	25-1
Table 26-1: National Farmers Union	26-1
Table 27-1: RSPB.....	27-1

1 Introduction

1.1 Purpose of the report

This report provides Highways England's response to the key issues raised by the relevant representations submitted by interested parties. A total of 2,375 relevant representations were submitted to the Examining Authority as set out below.

- One from local authorities;
- Four from other statutory organisations;
- Five from Parish Councils;
- Fifty-three from non-statutory organisations;
- Two thousand three hundred and seven from members of the public and businesses; and
- Five late relevant representations accepted by the Examining Authority.

All the relevant representations received have been reviewed and considered in this report. The purpose of the report is not to provide a direct response to each individual relevant representation but instead to identify key issues on a thematic basis and provide a response to these issues, while also identifying the interested parties who have raised them.

The report states the total number of interested parties that raised an issue at the introduction of each topic chapter, as this provides an indication of the level of interest in each topic.

1.2 Structure of the report

The relevant representations raised a wide range of issues, which the report addresses in line with the principal issues identified in the Rule 6 letter, Annex B, Initial Assessment of Principal Issues. The report addresses the relevant representations in the following topic chapters.

Chapter 1 Alternatives

Chapter 2 Needs and Benefits

Chapter 3 Draft Development Consent Order, Consultation and Process

Chapter 4 Design:

- Countess junction
- Green Bridge No.4
- Longbarrow junction

- River Till viaduct

Chapter 5 Noise and Vibration and Air Quality, Dust and Other Emissions

Chapter 6 Biodiversity, Biological Environment and Ecology

Chapter 7 Environmental Impact Assessment

Chapter 8 Landscape and Visual Effects and Design

Chapter 9 Flood Risk, Groundwater Protection, Geology and Land Contamination

Chapter 10 Heritage and Historic Environment

Chapter 11 Health and Wellbeing, Socio-Economic Effects and Other Environment

Chapter 12 Agriculture, Land and Compulsory Acquisition

Chapter 13 Public Rights of Way (PRoW)

Chapter 14 Tunnel

Chapter 15 Construction and Waste and Materials Management

Chapter 16 Traffic and Transportation, and Operations and Maintenance

Chapter 17 Scheme sections:

- Eastern section
- Central section
- Western section

The Development Consent Order (DCO) application documentation can be viewed on the Planning Inspectorate website (<https://infrastructure.planninginspectorate.gov.uk/projects/south-west/a303-stonehenge>) and further specific document references are outlined within the responses to the relevant representatives throughout this report.

2 Alternatives

2.1 Overview

- 2.1.1 A total of 337 interested parties raised matters regarding alternative solutions for the scheme in their relevant representations.
- 2.1.2 Table 2-1 provides a summary of the key issues raised in relation to alternatives, alongside a response from Highways England.

Table 2-1: Alternatives

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
Investment should be made in railway and public right of way improvements instead of on this scheme.	<p>The issues along the A303 require road improvement solutions consistent with the National Policy Statement for National Networks (NPSNN), as pursued via the Government's Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf).</p> <p>In relation to the consideration of alternatives, the NPSNN (paragraph 4.27) states:</p> <p><i>".....Where projects have been subject to full options appraisal in achieving their status within Road or Rail Investment Strategies or other appropriate policies or investment plans, option testing need not be considered by the examining authority or the decision maker. For national road and rail schemes, proportionate option consideration of alternatives will have been undertaken as part of the investment decision making process. It is not necessary for the Examining Authority and the decision maker to reconsider this process, but they should be satisfied that this assessment has been undertaken."</i></p> <p>Proposals for the improvement of the A303 between Amesbury and Berwick Down have been the subject of extensive study and consultation since 1991. The process of options identification and</p>	RR-0091, RR-0200, RR-0043, RR-0081, RR-0346, RR-0361, RR-0560, RR-0595, RR-0814, RR-0842, RR-1226, RR-1023, RR-1051, RR-0875, RR-1189, RR-0888, RR-1621, RR-1683, RR-2072, RR-1922, RR-1942, RR-2026, RR-1932, RR-2233

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
	<p>route selection leading to the scheme is summarised in the Case for the Scheme [APP-294] (section 3.2) and in Chapter 3 of the Environmental Statement, Assessment of Alternatives [APP-041], and further details can be found in the Technical Appraisal Report and Scheme Assessment Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).</p> <p>Alternative transport measures (including rail improvements) would not fully address the problems on the A303; instead the proposed road improvement is needed to address the problems and deliver the objectives set for the Scheme. The local public rights of way network is also being substantially improved as part of the scheme proposals as, assessed in Chapter 13 of the Environmental Statement, People and Communities [APP-051], Section 13.9, paragraphs 13.9.19 – 13.9.35.</p>	
Provide route F010.	<p>The F010 route option was discounted as it would not deliver the scheme objectives as well as the proposed Scheme. Route F010 would run through nearly 14 miles of largely tranquil, unspoilt countryside. This would require crossings of the Till Valley between Berwick St James and Winterbourne Stoke and of the Woodford Valley between Great Durnford and Upper Woodford on substantial viaducts. Both are designated as Special Areas of Conservation and Sites of Special Scientific Interest. The overall environmental impact when compared against the proposed scheme would be much greater, in terms of effects on local communities, conservation areas, listed buildings, landscape, biodiversity and environmentally designated sites, and with risks of impact on an area rich in archaeology despite being outside the boundary of the World Heritage Site. There would be disbenefits for road users having to travel on a longer southern route, and southern routes would also not interact effectively with the local road network, leaving higher levels of rat-running traffic. One of the objectives of the Scheme is to improve the quality of everyday life in local communities and route F010 would not satisfy this objective. Further information can be found in the Technical Appraisal Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).</p>	RR-0021, RR-0536, RR-0653, RR-0830, RR-1610, RR-1731, RR-2214, RR-2227, RR-2078, RR-2133, RR2371AS
Remove Stonehenge or move it somewhere else.	<p>Stonehenge is the country's most well-known prehistoric monument. The aim is to protect Stonehenge rather than remove it or move it somewhere else. Moving or removing Stonehenge would compromise the OUV of the WHS and would be fundamentally unacceptable.</p>	RR-0696

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
Introduce tolling.	<p>There is no intention to introduce tolling or charging on the A303. The Scheme is designed to operate as a free-flowing dual carriageway without dedicated car share lanes.</p> <p>As detailed in paragraph 1.3.16 of the Technical Appraisal Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/) Tolling was previously dismissed because the associated toll plaza would give rise to significant environmental implications, and because traffic would be likely to divert from the A303 onto less satisfactory roads.</p>	RR-1156, RR-1749, RR-2112
Provide a longer tunnel.	<p>Along with considerations of cost, the location and design of the tunnel portals have been optimised in terms of the natural topography of the area, impact within the WHS and the extent of benefit that will be secured by one of the key aims of the scheme which is to remove the sight and sound of the A303 traffic from much of the WHS landscape. With accompanying mitigation, the assessments show that the preferred solution is a 2-miles (3.3km) long tunnel extending between portals located adjacent to the existing A303 to the east of The Avenue and to the west of Normanton Down.</p> <p>The Preferred Route Announcement (PRA) by the Secretary of State in September 2017 was based on a 2.9km long twin bored tunnel. The western portal was located south of existing A303 and northwest of Normanton Gorse and eastern portal to the north of A303 and east of the Avenue. Since the PRA, during the Scheme development, and in response to consultation responses, the applicant has amended the scheme to extend the tunnel. Two changes were made to the location of the western portal which resulted in a 300m extension to the tunnel:</p> <ul style="list-style-type: none"> the end of the bored tunnel was moved 100m west to avoid impact on a scheduled barrow (NHLE No. 1010832 – Bowl barrow south of the A303 and north west of Normanton Gorse) that contributes to the OUV of the WHS; and a 200m cut-and-cover extension, or canopy, was added for improvement in landscape and visual connectivity and tranquillity within the WHS. <p>At the eastern end a cut-and-cover extension of 85m has been added to suit topography for</p>	RR-0009, RR-0012, RR-0028, RR-0059, RR-0190, RR-0067, RR-0114, RR-0077, RR-0081, RR-0201, RR-0550, RR-0371, RR-0601, RR-0475, RR-0637, RR-0722, RR-0668, RR-0743, RR-1347, RR-1321, RR-1369, RR-1389, RR-1492, RR-1434, RR-1423, RR-0867, RR-0024, RR-1548, RR-1592, RR-1658, RR-1702, RR-1853, RR-1708, RR-1844, RR-2121, RR-2247, RR-1701, RR-1640, RR-1999, RR-2004, RR-2114, RR-1833, RR-1653, RR-2305, RR-1957, RR-2235,

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
	<p>improvement in landscape and visual connectivity and tranquillity within the WHS.</p> <p>Further westwards extensions of the tunnel were ruled out because of topographical and technical constraints, and because they would not deliver sufficient additional benefits to justify the additional cost.</p>	RR-2076, RR-2025, RR-2329, RR-2048, RR-2162, RR-2090, RR-1896
Provide an alternative route to the south of the WHS.	A full range of routes outside the WHS were identified and appraised during the course of the Scheme's development. All have been discounted as they would not be as successful as the proposed scheme in delivering the Scheme objectives or were discounted on environmental grounds. Further information can be found in the Technical Appraisal Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).	RR-0020, RR-0018, RR-0059, RR-0309, RR-0190, RR-0122, RR-0054, RR-0141, RR-0084, RR-0556, RR-0536, RR-0601, RR-0402, RR-0495, RR-0653, RR-0649, RR-0668, RR-0815, RR-1220, RR-1347, RR-1237, RR-1261, RR-1143, RR-1391, RR-1407, RR-1408, RR-1451, RR-1449, RR-1610, RR-0915, RR-0963, RR-1010, RR-1110, RR-1109, RR-1616, RR-1731, RR-1759, RR-1633, RR-1802, RR-1868, RR-1793, RR-1837, RR-2121, RR-1734, RR-1782, RR-1688, RR-2146, RR-2069, RR-2234, RR-2171,

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
		RR-2064, RR-1976, RR-2078, RR-2112, RR-2209, RR-2358, RR-2310, RR-2322, RR-2162
Provide Salisbury Bypass.	A route deviating as far south as Salisbury would not deliver the Scheme objectives. This was considered as part of the full range of options identified and appraised during the course of the Scheme's development. The overall environmental impact when compared against the proposed scheme would be much greater, in terms of effects on local communities, conservation areas, listed buildings, landscape, biodiversity and environmentally designated sites, and with risks of impact on an area rich in archaeology despite being outside the boundary of the World Heritage Site. Journey times, travel costs, incidents of accidents and emissions would be higher. In addition, because the route does not link to existing local roads near the existing A303, there would be more traffic and rat running on those roads. One of the objectives of the Scheme is to improve the quality of everyday life in local communities and a Salisbury bypass would not satisfy this objective. Further information can be found in the Technical Appraisal Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).	RR-2037, RR-2128, RR-1963, RR-2133
Make the road even wider (3 lanes each direction) to include a hard shoulder as a safe area for break downs.	The Scheme will deliver a high-quality dual carriageway to current design standards following the recommendations and guidelines given in the Design Manual for Roads and Bridges (DMRB) and having full regard to operational safety and capacity. With forecast levels of traffic, it is anticipated that a dual two-lane carriageway will provide sufficient capacity. Further information can be found in paragraph 6.4.5 of the Transport Assessment [APP-297]. Hard shoulders are not being provided along the new dual carriageway which is standard practice on this type of road and is in accordance with DMRB TD 27/05 Cross-Sections and Headrooms, Figure 4.3a Dimensions of Cross-Section Components for Rural All-Purpose Roads (Dual Carriageway). Outside the tunnel, laybys will be provided along the new road (indicative locations are shown on the General Arrangement Drawings [APP-012]), with a spacing in line with current design standards and a 1m wide hard strip will be provided along each side of each carriageway. Within the tunnel, 1.5 metre wide emergency walkways will be provided for safe emergency use. This detail can be seen in the Engineering Section Drawings, Cross Sections [APP-011].	RR-0168, RR-0141, RR-0358, RR-0659, RR-1860

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
A bypass of Shrewton should be considered.	A bypass of Shrewton would be a significant scheme in its own right, which is beyond the scope of the A303 scheme and instead would be a matter for Wiltshire Council as highway authority for the A360 (with Highways England responsible for the Strategic Road Network). The Scheme will remove congestion from the A303 and will relieve Shrewton of rat running traffic that is currently seeking to avoid that congestion. Further information on the congestion reduction impacts anticipated on the A303 can be found in the Transport Assessment [APP-297] Chapter 6, Paragraph 6.5.7. The impacts of the Scheme for local roads around Shrewton can be found in the same document within Chapter 6, Paragraphs 6.3.14 and 6.3.15.	RR-0306
Requested dualling of A303 over Black Down Hills.	The dualling of the A303 over the Blackdown Hills is not part of the Scheme. The Government's Road Investment Strategy (RIS) (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf) plans to improve connectivity to the South West by upgrading the A303/A358 corridor between the M3 and M5 to dual carriageway standard along its entire length. The RIS also makes clear that the A303/A30 over the Blackdown Hills will have small-scale improvement works and the route will therefore not be dualled.	RR-1963
Put the bypass south of Winterbourne Stoke.	A public consultation was held in early 2017 to gather feedback on the proposals including on route options and options for a northern or southern bypass to Winterbourne Stoke. In taking account of feedback received and balancing a range of considerations, notably the greater impact of a southern route on nearby communities, the northern route was chosen as part of the preferred route announced in September 2017. Further information can be found in the in the Scheme Assessment Report (section 5.4) (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/) and the 2017 Consultation Report (Section 6.2) (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).	RR-0839, RR-1834
The whole A303 corridor needs improving.	As set out within its Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), the Government's aim is to upgrade all remaining single carriageway sections of the A303/A358 corridor into a high-quality dual carriageway route, improving connectivity to the South West.	RR-0098, RR-1626
The Scheme should be built as soon as possible.	The application for development consent was accepted for examination on 16 November 2018. Following the six-month Examination, which commenced after the close of the Preliminary	RR-0006, RR-1053

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
	<p>Meeting on 2nd April 2019, the Planning Inspectorate will prepare a report and make a recommendation on the application to the relevant Secretary of State within three months of the close of the Examination. The relevant Secretary of State then has a further three months to make the decision on whether to grant or refuse development consent. Subject to consent being given preparatory works, including further archaeological investigations, would be carried out with start of works anticipated in 2021 with the Scheme open to traffic in 2026.</p>	
<p>Surprised tunnel itself is not further from Stonehenge.</p>	<p>A full range of route options has been identified and appraised during the development of the Scheme, including routes to the north and south and outside the World Heritage Site (WHS). A preferred route was announced in September 2017 and this was developed into the proposed Scheme submitted for approval in October 2018. Under the Scheme, the tunnel route would be further away from Stonehenge than the existing A303 and the route has been selected to ensure that Stonehenge would be outside the zone of influence of the tunnel construction. The portals have been optimally located adjacent to the existing road and there would be no benefit to Stonehenge in routing the tunnel further north or south.</p> <p>The western portal has been located to avoid heritage assets and asset groups and has been developed to reduce the visual intrusion of new highway sections within the WHS. Any movement of the tunnel alignment to the south would bring the retained cutting in to conflict with designated heritage assets (Scheduled Monuments) that contribute to the OUV of the WHS including a Pond barrow south of the A303 and 400m west of Normanton Gorse containing the 'Wilsford Shaft' (NHLE 1010833) and a Linear boundary from south east of Winterbourne Stoke crossroads to south west of The Diamond on Wilsford Down (NHLE 1010837). Stonehenge is outside the zone of influence of the proposed tunnel alignment, and any movement of the alignment north would bring it within influence of Stonehenge.</p> <p>The location of the eastern portal is determined by topography and by features such as; the Avenue Scheduled Monument (NHLE 1010140) to the west, the A303 to the South, the Nile Clumps and power pylon to north, Blick Mead, Amesbury Abbey Registered Park and Garden and Amesbury Conservation Area to the south and Countess junction to the east. No viable option has been identified for any significant change to this location from that proposed in the PRA for the Scheme. (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/)</p>	<p>RR-0014, RR-0122, RR-0517, RR-0668, RR-1520, RR-2264, RR-2215</p>

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
The Scheme should consist of a dual carriageway at grade maintaining view of Stonehenge.	A dual carriageway through the WHS without a tunnel is not possible, no matter how well landscaped or screened. This is because it would cause unacceptable damage to the Outstanding Universal Value (OUV) of the WHS. It would also likely breach the World Heritage Convention and would be unlikely to receive development consent, conflicting with national and local planning policies. Further information can be found in the Technical Appraisal Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/). Additionally, keeping the existing A303 open past Stonehenge would retain the damaging impact that the existing road has on the OUV of the WHS. It would not address one of the fundamental objectives of the Scheme, which, as stated in the Case for the Scheme [APP-294], is to help conserve and enhance the World Heritage Site, by removing the sights and sounds of traffic through much of the WHS landscape, and make it easier to reach and explore, by reconnecting the northern and southern parts of the Stonehenge section of the WHS.	RR-0208, RR-0303, RR-0485, RR-0535, RR-0641, RR-0709, RR-0687, RR-0730, RR-0765, RR-1269, RR-1505, RR-1475, RR-0379, RR-0954, RR-1037, RR-1105, RR-1544, RR-1658, RR-1841, RR-1985, RR-2128, RR-2139, RR-1992, RR-2170
The Scheme should only consist of a bypass around Winterbourne Stoke.	As set out within its Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), the Government's aim is to upgrade all remaining single carriageway sections of the A303/A358 corridor into a high-quality dual carriageway route, improving connectivity to the South West. Solely building the Winterbourne Stoke bypass would not achieve that aim. Countess roundabout and the stretch of A303 past Stonehenge would remain congested and the WHS would still suffer the adverse effects of the A303. Separating the Scheme in this way would also be inefficient and less cost efficient.	RR-1651
The Scheme should only consist of a motorway junction at Amesbury.	As set out within its Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), the Government's aim is to upgrade all remaining single carriageway sections of the A303/A358 corridor into a high-quality dual carriageway route, improving connectivity to the South West. Solely building the junction at Amesbury (Countess roundabout) would not achieve that aim and the stretch of A303 through Winterbourne Stoke and past Stonehenge would remain congested and the WHS would still suffer the adverse effects of the A303.	RR-0830
Objection to the tunnel proposal.	Proposals for the improvement of the A303 between Amesbury and Berwick Down have been the subject of extensive study and consultation since 1991. The process of options identification and route selection leading to the scheme is summarised in the Case for the Scheme [APP-294]	RR-0020, RR-0007, RR-0250, RR-0504, RR-0583, RR-0637,

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
	<p>(sections 3.2) and in Chapter 3 of the ES [APP-041] , Assessment of Alternatives [APP-041], and further details can be found in the Technical Appraisal Report and Scheme Assessment Report, (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/). The Scheme has been developed from an extensive process of options appraisal, including the consideration of options which avoided the World Heritage Site altogether, to identify the optimum solution, representing a significant investment by the Government aimed at addressing the congestion problems on the A303 and delivering benefits for the WHS. As stated in the Case for the Scheme [APP-294], the Scheme helps conserve and enhance the World Heritage Site, by removing the sights and sounds of traffic through much of the WHS landscape, making it easier to reach and explore, by reconnecting the northern and southern parts of the Stonehenge section of the WHS.</p>	<p>RR-1338, RR-1392, RR-1437, RR-1010, RR-1027, RR-0888, RR-1625, RR-1766, RR-1809, RR-1847, RR-1815, RR-1856, RR-1849, RR-2101, RR-2182, RR-1931, RR-2360, RR-1953, RR2374AS</p>
<p>Disappointed by the lack of alternatives considered during the options appraisal.</p>	<p>Proposals for the improvement of the A303 between Amesbury and Berwick Down have been the subject of extensive study and consultation since 1991. The process of options identification and route selection leading to the Scheme is summarised in the Case for the Scheme [APP-294], Section 3.2 and in Chapter 3 of the ES, Assessment of Alternatives [APP-041], in compliance with the requirements of Schedule 4 of the Environmental Impact Assessment Regulations 2017. The Scheme has been developed from an extensive process of options appraisal, including the consideration of options which avoided the World Heritage Site altogether, to identify the optimum solution, representing a significant investment by the Government aimed at addressing the congestion problems on the A303 and delivering benefits for the WHS. Further details on the options and route selection can be found in the Technical Appraisal Report and the Scheme Assessment Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).</p> <p>In relation to the consideration of alternatives, the National Policy Statement for National Networks (paragraph 4.27) states:</p> <p><i>".....Where projects have been subject to full options appraisal in achieving their status within Road or Rail Investment Strategies or other appropriate policies or investment plans, option testing need not be considered by the examining authority or the decision maker. For national road and rail schemes, proportionate option consideration of alternatives will have been undertaken as part of the investment decision making process. It is not necessary for the Examining Authority and the decision maker to reconsider this process, but they should be</i></p>	<p>RR-0161, RR-0224, RR-0171, RR-0181, RR-0169, RR-0151, RR-0121, RR-0301, RR-0456, RR-0560, RR-0558, RR-0572, RR-0440, RR-0686, RR-0712, RR-0771, RR-0827, RR-0824, RR-1239, RR-1301, RR-1247, RR-1230, RR-1334, RR-0953, RR-0969, RR-0995, RR-1011, RR-1095, RR-0883, RR-1621, RR-1562, RR-1898, RR-1683, RR-1758, RR-1711, RR-1877, RR-1661, RR-2355, RR-2230, RR-2112, RR-2329, RR-2143, RR-2293, RR-2353,</p>

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
	<p><i>satisfied that this assessment has been undertaken."</i></p> <p>The assessment has been undertaken in accordance with the process set out above.</p>	RR-2370, RR-2197
Move the road a bit further south into farming land.	<p>A full range of route options has been explored and appraised during the development of the Scheme, including routes to the south. The tunnel route would be farther away from Stonehenge than the existing A303 and has been selected to ensure that Stonehenge would be outside the zone of influence of the tunnel construction. The portals have been optimally located adjacent to the existing road and there would be no benefit in routing the tunnel farther south.</p> <p>The western portal has been located to avoid heritage assets and asset groups and has been developed to reduce the visual intrusion of new highway sections within the WHS. In particular, any movement of the tunnel alignment to the south would bring the retained cutting in to conflict with designated heritage assets (Scheduled Monuments) that contribute to the OUV of the WHS including a Pond barrow south of the A303 and 400m west of Normanton Gorse containing the 'Wilsford Shaft' (NHLE 1010833) and a Linear boundary from south east of Winterbourne Stoke crossroads to south west of The Diamond on Wilsford Down (NHLE 1010837).</p> <p>The location of the eastern portal is heavily constrained by topography and by features such as the Avenue Scheduled Monument (NHLE 1010140) to the west, the Nile Clumps and power pylon to north, Blick Mead, Amesbury Abbey Registered Park and Garden, Amesbury Conservation Area and the A303 to the south and Countess junction to the east. No viable option has been identified for any significant change to this location from that proposed in the Preferred Route Announcement for the Scheme (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).</p> <p>Surface solutions, including those to the South, have been discounted because they would be too damaging in terms of environmental impacts and/or they would not provide effective transport solutions that would deliver the Scheme's objectives. Detailed information can be found in the Technical Appraisal Report and Scheme Assessment Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).</p>	RR-0141, RR-1137, RR-1868, RR-2310

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
Assess more effective use of the M4/M5 corridor.	Both the M4/M5 and A303/A358 corridors are important strategic routes to the South West. The Government's Road Investment Strategy sets out the improvements it is planning for both corridors: (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf). The M4/M5 corridor will remain the preferred route for the majority who wish to travel to the south west; although the scheme will improve journey times along the A303 and this will result in some trips rerouting to the A303. As set out in Appendix C of the Combined Modelling and Appraisal Report [APP-301], Sections 5.4.10 to 5.4.15, the Amesbury to Barford Down scheme is forecast only to result in about 1000 vehicles per day diverting from the M4 and M5 corridor. Similarly, improvements to the M4/M5 are likely to have modest effects on demand along the A303 and thus would not address the problem as the road passes Stonehenge.	RR-0196, RR-1883, RR-1944, RR-2159
Carry out other improvements in Wiltshire.	The Government's Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf) set out its plans to upgrade the A303 through Wiltshire. The upgrading of non-trunk roads in the county is a matter for Wiltshire Council as the responsible highway authority.	RR-1758, RR-2037
To ensure traffic flow along the A303, the Scheme need only provide junctions with the A345 and A360.	In addition to the junctions with the A345 and A360, the congestion problems along this section of A303 arise because the existing single carriageway does not have sufficient capacity to cater for the volume of traffic seeking to use the road. Only improving the junctions would not solve the traffic problems and would not achieve the objectives for the Scheme. Further information can be found in the Transport Assessment [APP-297] section 6.4.	RR-0830
Use the existing A303 as a unidirectional dual carriageway, with the B3086 carrying traffic travelling in the opposite direction.	Creating a one-way system utilising the existing A303 one way and the B3086/B3083 in the other direction would not be a viable solution. Existing traffic flows on the local road network can be seen in the Transport Assessment [APP-297] figure 4-6. If existing eastbound traffic on the A303 was routed via the B3086 and B3083, this would lead to an increase in traffic levels on the Packway from 5,100 vehicles per day to 17,600. This increased traffic flow would impact on local communities along the Packway route, such as Larkhill and Bulford and would not deliver the Scheme objectives. Keeping open the A303 through the WHS would also retain the damaging effect it has on the OUV of the site.	RR-0007, RR-0557

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
The Scheme proposes the dumping of spoil within Winterbourne Stoke. Aren't there alternative sites to keep excavated spoil?	As is reported in the Tunnel Arisings Management Strategy [APP-285], Highways England assessed a range of potential spoil deposition sites, covering both on-site and off-site deposition locations. The assessment concluded that the use of an on-site deposition location was preferable due to the avoidance of off-site transportation of tunnel arisings and the associated potential for significant traffic, traffic noise, and air quality effects. Following a comparative assessment of nine potential on-site locations, land to the east of Parsonage Down was identified as the preferred on-site location because it would confine all the activity for deposition of tunnel arisings to one area that would already be affected by the Scheme (for the purpose of essential landscape mitigation) and would therefore be operationally efficient; it would, on balance, have lower impacts compared to other options, and would also provide the greatest opportunity for biodiversity enhancement. Further details are presented in ES Appendix 12.1, Tunnel Arisings Management Strategy [APP-285], at Sections 3 and 4.	RR-1008
Move the carpark at the Visitor Centre further away from Stonehenge.	Consideration of car parking arrangements for the WHS is beyond the scope of the Scheme. However, Highways England will liaise closely with Wiltshire Council, Historic England, English Heritage, National Trust and others in doing what it can to support proposals for creating suitable facilities for visitors to the WHS. The Scheme will remove the sight and sound of the road from the WHS landscape and will create a considerably enhanced experience for visitors. New viewing opportunities of Stonehenge will be created by the conversion of the existing A303 surface road to a restricted byway within the WHS.	RR-0007, RR-0122
There are other much cheaper alternatives to the Scheme which will allow public money to be better spent on areas such as health care and providing for those in need.	There are no cheaper alternatives that can provide an acceptable solution for addressing the problems on the A303 and deliver the scheme objectives. The Scheme has emerged from an extensive appraisal of options as the best solution for delivering the Government's strategy for improving connectivity to the South West by creating a high-quality dual carriageway along the A303/A358 corridor. Detailed information on the appraisal of alternative options can be found in the Technical Appraisal Report and Scheme Assessment Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).	RR-0141, RR-0361, RR-0358, RR-0794, RR-1321, RR-0956, RR-0971, RR-1130, RR-1535, RR-1602, RR-1839, RR-1835, RR-1734, RR-1922, RR-2243, RR-1944, RR-1934, RR-1942, RR-2347, RR-2368, RR-2310, RR-2271, RR-1926

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
Remove car park/ layby west of Scotland Lodge Farm.	Highways England confirms that the Scheme does not propose the closure of the layby, shown on sheet 3 of the Rights of Way and Access Plans [APP-009]. However, it is proposed that this layby be filled, profiled, soiled and seeded, to discourage vehicular use. This has been agreed with Wiltshire Council, and will be captured in the Statement of Common Ground being prepared with Wiltshire Council to be submitted to the Examination in due course.	RR-1046, RR-1043, RR-1977, RR-1980, RR-2108, RR-2354, RR-1606, RR-2345
The visitor centre should be serviced by a dedicated slip lane or underpass.	The Scheme's traffic modelling does not support the need for a dedicated route from the A303 to the Stonehenge Visitor Centre which will be easily and safely accessed via the A360 and the new Longbarrow junction. Further information can be found in the Transport Assessment [APP-297] section 6.7.	RR-0406
Using a tunnel is poor value for money compared with widening the road to a dual carriageway within the WHS and using screening.	<p>The value for money offered by the proposed tunnel solution has been identified from an exhaustive appraisal of options. In addition to delivering benefits in terms of improved journey times, reduced accidents and community benefits, the Scheme will deliver substantial value to the WHS in terms of transforming the Stonehenge landscape for the benefit of the current 1.5 million people who visit the site every year. This results in the Scheme providing clear value for money. Details of the ratio between benefits and costs for the Scheme are detailed in the Case for the Scheme [APP-294] (section ref 5.3.1.5).</p> <p>A dual carriageway through the WHS without a tunnel is not viable, no matter how well landscaped or screened. This is because it would cause unacceptable damage to the OUV of the WHS. It would also likely breach the World Heritage Convention and would be unlikely to receive development consent, conflicting with national and local planning policies. Further information can be found in the Technical Appraisal Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/). Additionally, keeping the existing A303 open past Stonehenge would retain the damaging impact that the existing road has on the OUV of the WHS. It would not address one of the fundamental objectives of the Scheme, which, as stated in the Case for the Scheme [APP-294], is to help conserve and enhance the World Heritage Site, by removing the sights and sounds of traffic through much of the Stonehenge landscape, and make it easier to reach and explore, by reconnecting the northern and southern parts of the Stonehenge section of the WHS.</p>	RR-0535, RR-0659, RR-0775, RR-1495, RR-1457, RR-1598, RR-1909, RR-2005
A more imaginative solution is	Proposals for the improvement of the A303 between Amesbury and Berwick Down have been the	For a list of all RR

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
needed.	<p>subject of extensive study and consultation since 1991. The process of options identification and route selection leading to the Scheme is summarised in the Case for the Scheme [APP-294], Section 3.2 and in Chapter 3 of the ES [APP-041], Assessment of Alternatives, in compliance with the requirements of Schedule 4 of the Environmental Impact Assessment Regulations 2017. The Scheme has been developed from an extensive process of options appraisal, including the consideration of options which avoided the World Heritage Site altogether, to identify the optimum solution, representing a significant investment by the Government aimed at addressing the congestion problems on the A303 and delivering benefits for the WHS. Further details on the options and route selection can be found in the Technical Appraisal Report and the Scheme Assessment Report (at:https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).</p> <p>In relation to the consideration of alternatives, the National Policy Statement for National Networks (paragraph 4.27) states:</p> <p><i>“.....Where projects have been subject to full options appraisal in achieving their status within Road or Rail Investment Strategies or other appropriate policies or investment plans, option testing need not be considered by the examining authority or the decision maker. For national road and rail schemes, proportionate option consideration of alternatives will have been undertaken as part of the investment decision making process. It is not necessary for the Examining Authority and the decision maker to reconsider this process, but they should be satisfied that this assessment has been undertaken.”</i></p> <p>The assessment has been undertaken in accordance with the process set out above.</p>	that raised this issue, please see Appendix B.
Provide a bypass around the World Heritage Site instead of a tunnel.	A full range of routes outside the WHS has been identified and appraised during the course of the Scheme's development. All have been discounted as they would not be as successful as the proposed Scheme in delivering the Scheme objectives. Surface routes to the north of the WHS were rejected due to the location of settlements giving little scope to realign the A303 without substantial harmful impacts. A surface route to the south of Salisbury was rejected because the length of such an option would lead to substantially increased habitat loss and severance compared to other corridors. This option, whilst offering improved access to Salisbury would fail	RR-1448, RR-1531, RR-1602, RR-1847, RR-1844, RR-2064, RR-2209, RR-2296, RR2372AS

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
	to reduce journey times for users of the A303 and would not, therefore, meet the objectives for the Scheme. Surface routes south of the WHS but north of Salisbury would be significantly longer and which would pass through a largely unspoilt, high quality, tranquil landscape with an additional crossing of the River Avon Special Area of Conservation (SAC). They would have a much larger footprint and a greater overall environmental impact, despite having greater benefits for the WHS. There would be disbenefits for road users having to travel on a longer southern route, and southern routes would also not interact effectively with the local road network, leaving higher levels of rat-running traffic adversely affecting the quality of life in local communities. One of the objectives of the Scheme is to improve the quality of everyday life in local communities and a bypass round the WHS would not satisfy this objective. Further information can be found in the Technical Appraisal Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/) and section 3.2 of the Environmental Statement [APP-041].	
Wouldn't an enlarged road cutting be more beneficial than a tunnel?	A dual carriageway in an enlarged road cutting through the WHS without a tunnel is not possible, no matter how well landscaped or screened. This is because it would cause unacceptable damage to the Outstanding Universal Value (OUV) of the WHS. It would also likely breach the World Heritage Convention and would be unlikely to receive development consent, conflicting with national and local planning policies. Further information can be found in the Technical Appraisal Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).	RR-1628, RR-2243
Isn't a high standard open road safer than a tunnel in this area?	<p>An open road in this location would not meet the Scheme objective of "<i>conserving and enhancing the WHS</i>" by removing the sight and sound of traffic from much of the WHS landscape. The tunnel will be designed and built to the highest standards including the European Directive on minimum safety requirements for tunnels – 2004/54/EC, enacted in the UK Road Tunnel Safety Regulations 2007 (and amendment 2009), as well as Highways England's own Design Manual for Roads and Bridges (Volume 2, Section 2, Part 9 – BD78/99 – Design of Road Tunnels) that will secure its safe operation.</p> <p>The safety of road users has been assessed and the results of that analysis indicate that the Scheme provides a reduction both in the number of accidents (32 fewer) and the number of casualties (108 fewer) over a 60 year period (see section 7.3 of the Transport Assessment [APP-297]).</p>	RR-1145, RR-2243, RR-1954, RR2371AS
Consider other short-term	There are no short-term options that offer an alternative to the Scheme to address the problems	RR-0361, RR-0447,

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
options to the tunnel that have no impact on the environment, for example: screening, speed restrictions and alternative routes.	on the A303 and which would deliver the Scheme's objectives. For instance, screening alongside the A303 past Stonehenge would be detrimental to the OUV of the WHS and would not resolve the congestion problems currently experienced on the A303. Imposing additional speed restrictions would not remove the congestion. Observed journey times along the 30-mile section of the A303 between the A34 and A36 shown in the Transport Assessment [APP-297], Section 6.5.4 indicate an average speed during busy days of 45 mph, demonstrating that speeds are already very low, and this is forecast to reduce to 35mph by 2041. Additionally, there are no alternative routes that can take the traffic, other than those that are currently used by rat running traffic which badly affects local communities and still leaves congestion on the A303.	RR-1015, RR-1743, RR-1899, RR-2112
The responsibility of the route alignment sits with multiple parties. The MoD should not be solely accused of not allowing a northern bypass of the WHS.	A full range of route corridors and, within these, routes both within and outside the WHS has been identified and appraised during the course of the Scheme's development. The selection of the preferred route was made based on the assessment of multiple criteria and not due to the MoD or another government department not permitting use of their land. As detailed in table 3.1 of Chapter 3 of the ES [APP-041], it was found that there was limited scope for surface routes north of the WHS because of the proximity of Larkhill and Durrington. This northern route corridor would also have caused substantial harm to important heritage features such as Durrington Walls and the Outstanding Universal Value of the WHS, and so would not deliver overall heritage benefits. There would also have been significant adverse impacts on the environment and local communities. Further information can be found in the Technical Appraisal Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).	RR-0213
Green Bridge No. 1 should not be a green bridge, it should be a standard bridge of concrete and steel.	Green Bridge No. 1, in the location and design proposed through the DCO, is essential mitigation. The green bridges on the Scheme perform a number of functions. In the case of Green Bridge No. 1, it maintains agricultural access and accommodates a new restricted byway, which continues along the north side of the new road westwards to connect with the existing byway SLAN3, providing a safe crossing of the A303 for walkers, cyclists and horse riders. In addition, the landscaped green bridge would aid the integration of the Scheme into the landscape, improve ecological connectivity, enhancing opportunities for dispersal out of the Parsonage Down SSSI in a way that a standard bridge of concrete and steel would not.	RR-0820
Minor scheme details have taken precedence over key aspects, for example whether	Proposals for the improvement of the A303 between Amesbury and Berwick Down have been the subject of extensive study and consultation since 1991. Following Government's announcement of its commitment to this scheme in the Road Investment Strategy in 2015, a consultation on	RR-2288, RR-2303

Summary of Comments Received	Highways England's Response	Relevant Representation Reference Number
the Scheme should comprise a tunnel or surface route.	potential route options was held in 2017. This led to the confirmation of the preferred route in September of that year. The subsequent statutory and non-statutory consultations in 2018 provided further detail on the proposed route and informed the DCO application. The process of options identification and route selection leading to the scheme is summarised in Chapter 3 of the Case for the Scheme [APP-294], in Chapter 3 [APP-041] of the Environmental Statement, and further details can be found in the Technical Appraisal Report and the Scheme Assessment Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/). The scheme has been developed from an extensive process to identify an optimum solution that represents a significant investment by the Government which will address the congestion problems on the A303 and deliver benefits for the WHS.	

3 Needs and Benefits

3.1 Overview

- 3.1.1 A total of 861 interested parties raised matters regarding the needs and benefits of the scheme in their relevant representations.
- 3.1.2 Table 3-1 provides a summary of the key issues raised in relation to needs and benefits, alongside a response from Highways England.

Table 3-1: Needs and benefits

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Provisions should be made for easy parking for NMUs.	The Scheme will not be providing additional parking. Any additional provision will be for others to pursue in liaison with Wiltshire Council as highway authority. Access for non-motorised users including those with limited mobility, will be provided along the existing A303 and other new public rights of way as shown on the Rights of Way and Access Plans [APP-009].	RR-0380, RR-1060, RR-2128, RR-2007
Remove all street furniture, lay-bys, and bus stop pull-in on the A303 through Winterbourne Stoke. Narrow the junction with the B3083, enhance with trees, narrow the road, introduce traffic calming measures etc.	The street furniture associated with the trunk road, such as signs and the speed camera, will be removed, further to its revised classification under the DCO. As part of the Scheme, the existing B3083 junction will be modified to reflect the local nature of the de-trunked A303. The existing road through the village will also be narrowed to accommodate a shared pedestrian/cycle path to the north of the road.	RR-2108, RR-2354, RR-1606, RR-2345
The previous A303 Stonehenge Road provided a view of Stonehenge. Will a viewing location of Stonehenge be provided under the new scheme?	The current A303 within the WHS will be converted to a public right of way. This will significantly enhance the opportunity for people to explore the WHS and enjoy views of Stonehenge in a safer and more enjoyable way than from a vehicle travelling along a busy road.	RR-1743
Stopped up roads should have	Items D-CH1 and D-CH2 of Table 3.2b of the Outline Environmental Management Plan secure	RR-2076

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
the tarmac removed and returned to greenfield.	that the road surface of the redundant A303 within the WHS and the redundant A360 and Longbarrow Junction will be broken up, except to the extent they are required to create a new Public Right of Way and/or Private Means of Access. Compliance with the OEMP is secured through Schedule 2, paragraph 4 of the draft DCO [APP-020].	
Improve the rest of the A303 corridor.	As set out within its Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), the Government's aim is to transform all remaining single carriageway sections of the A303/A358 corridor into a high-quality dual carriageway route, linking the South East with the South West. By providing a free-flowing and reliable connection to the South West, as part of the upgrading of the A303/A358 corridor, the scheme will help to boost productivity in the region. The scheme will make the South West an easier place for tourists to access, which is a major part of the region's economy. It will also facilitate new jobs and long-term prosperity, meeting the needs of a growing residential and growing population. Further information can be found in Chapter 5 of The Case for the Scheme [APP-294].	RR-0105, RR-1330, RR-1495, RR-1021, RR-1831, RR-1745, RR-2275, RR-1626
The road should be of motorway standard; removing minor accesses onto it.	The Scheme will be constructed as a high-quality dual carriageway, with grade-separated junctions. and no minor accesses onto the new dual carriageway. It will form part of a wider high-quality dual carriageway to the south west as part of the Government's package of improvements to the A303/A358 corridor, however, it is not proposed that it will be classified as a motorway.	RR-0013
The Scheme does not offer value for money.	The Scheme is part of the Government's programme of improvements along the A303/A358 corridor designed to upgrade the route to a high-quality dual carriageway, in recognition of the problems along the corridor and the need to improve connectivity to the South West. The proposed tunnel solution is value for money and has been identified from an exhaustive appraisal of options. In addition to delivering benefits in terms of improved journey times, reduced accidents and community benefits, the Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole. The OUV of the WHS would be sustained. This all adds up to the Scheme providing clear value for money. Further information can be found in The Case for the Scheme [APP-294].	For a list of RR that have raised this issue, please refer to Appendix C.
General objection to / concerns about the Scheme.	The Scheme is part of the Government's programme of improvements along the A303/A358 corridor designed to upgrade the route to a high-quality dual carriageway, in recognition of the problems along the corridor and the need to improve connectivity to the South West. It brings	For a list of RR that have raised this issue, please refer

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	forward a number of benefits and meets a number of traffic, economic and environmental needs. This is set out in the Case for the Scheme [APP-294]. The proposed tunnel solution is the best solution that has been identified from an exhaustive appraisal of options. This is set out in Chapter 3 of the Environmental Statement [APP-041].	to Appendix C.
The Scheme is bound to fail like previous attempts.	This Scheme is part of the Government's National Infrastructure Plan in which it has prioritised infrastructure investment for the UK against the competing demands from other public services. In its published Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), the Government has indicated its commitment to this Scheme as part of a programme of improvements needed to upgrade the A303 route to a high-quality dual carriageway. The Scheme will be examined by an independent panel through the statutory process, after which it will make a recommendation to the Secretary of State, who will determine whether to approve the application.	RR-0098, RR-0783, RR-1918, RR-2090
In favour of the Scheme.	Your support is noted.	RR-0006, RR-0013, RR-0032, RR-0030, RR-0033, RR-0311, RR-0105, RR-0140, RR-0272, RR-0384, RR-0543, RR-0821, RR-0859, RR-1429, RR-0924, RR-0932, RR-1013, RR-1003, RR-1041, RR-1844, RR-2229, RR-1803, RR-1879, RR-1745, RR-2275, RR-1742, RR-1978, RR-1977, RR-2126, RR-0896, RR-1626
The proposed Scheme is poor value for money when compared to the southern	The southern bypass route option was discounted as it would not deliver the Scheme objectives as well as the scheme. Although the cost of the southern bypass route option would be less than the proposed tunnel route, its benefits would be significantly less and its disbenefits greater. It	RR-1610, RR-1758, RR-1918, RR-2214

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
bypass route option.	would run through nearly 14 miles of largely tranquil, unspoilt countryside. This would require crossings of the Till Valley between Berwick St James and Winterbourne Stoke and of the Woodford Valley between Great Durnford and Upper Woodford on substantial viaducts. Both are designated as Special Areas of Conservation and Sites of Special Scientific Interest. The overall environmental impact when compared against the proposed scheme would be much greater, in terms of effects on local communities, conservation areas, listed buildings, landscape, biodiversity and environmentally designated sites, and with risks of impact on an area rich in archaeology despite being outside the boundary of the World Heritage Site. There would be disbenefits for road users having to travel on a longer southern route, and southern routes would also not interact effectively with the local road network, leaving higher levels of rat-running traffic. One of the objectives of the Scheme is to improve the quality of everyday life in local communities and route F010 would not satisfy this objective. Further information can be found in the Technical Appraisal Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).	
The A303/A350 roundabout needs to be improved.	Potential improvements of the A350 are beyond the scope of the Scheme.	RR-1626
Who is going to pay for this Scheme? Have you looked at alternative funding streams?	The Government is committed to the Scheme and its funding pursuant to the Road Investment Strategy, and as such there is no requirement to look for alternative funding streams. Further detail on the funding of the Scheme is provided in the Funding Statement that accompanies this Application [APP-024] and the Funding Statement Addendum submitted post-application [AS-012].	RR-1844
The proposal doesn't meet the Scheme objectives.	The Scheme as proposed has emerged from an exhaustive appraisal of options as the best solution to meet the objectives set for it. Further information on the appraisal process and route selection can be found in the Technical Appraisal Report and Scheme Assessment Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/) as well as Chapter 3 of the Environmental Statement [APP-041]. The Case for the Scheme [APP-294] sets out the Scheme objectives and clearly demonstrates how the Scheme submitted for approval meets the objectives.	RR-0031, RR-0241, RR-0280, RR-0361, RR-0534, RR-0685, RR-1278, RR-1741, RR-1898, RR-1878, RR-1686, RR-1803, RR-2329, RR-2201, RR-2123
Why do we need a tunnel?	A dual carriageway through the World Heritage Site (WHS) without a tunnel is not possible, no matter how well landscaped or screened. This is because such options would cause unacceptable damage to the Outstanding Universal Value of the WHS, would be in contravention	RR-1617, RR-2061

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>of the World Heritage Convention and would be unlikely to receive development consent, conflicting with national and local planning policies. In addition, routes outside the WHS have been discounted because they would not deliver the Scheme objectives. Further information on the appraisal of alternative route options, including non-tunnel solutions, can be found in the Case for the Scheme [APP-294] and Chapter 3 of the Environmental Statement [APP-041], and previously in the Technical Appraisal Report and Scheme Assessment Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).</p>	
Supportive comments on the need for the Scheme.	Your support for the need for the Scheme is noted.	RR-0023, RR-0030, RR-0127, RR-0594, RR-0407, RR-0821, RR-0876, RR-1338, RR-1350, RR-1475, RR-1108, RR-0881, RR-0877, RR-1741, RR-1658, RR-1840, RR-1651, RR-1844, RR-2269, RR-1745, RR-2275, RR-2125, RR-1672, RR-2032, RR-2306, RR-2143, RR-1989, RR-1626
Explain the economic benefits.	<p>By providing a free-flowing and reliable connection to the South West, as part of the upgrading of the A303/A358 corridor, the Scheme will help to boost productivity in the region. The Scheme will make the South West an easier place for tourists to access, which is a major part of the region's economy. It will also facilitate new jobs and long-term prosperity, meeting the needs of a growing residential and growing population. Further information can be found in The Case for the Scheme [APP-294].</p>	RR-0011, RR-0134, RR-0196, RR-0540, RR-0559, RR-0743, RR-1341, RR-1239, RR-1283, RR-1005, RR-1050, RR-1621, RR-1567, RR-1535, RR-1898, RR-1683, RR-1732, RR-1807, RR-1761, RR-2247, RR-1790, RR-1944,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
		RR-2211, RR-2205, RR-1935, RR-2206, RR-1948
Concern regarding the timescale to complete the tunnel.	The Secretary of State's decision is expected in April 2020, 12 months after the start of the 6 month DCO examination period and following periods for the Examining Authority to make its recommendation and the Secretary of State to consider this recommendation. If consent is granted this would lead to a start of main works construction in 2021 (preliminary works starting in 2020) and the Scheme is expected to be completed and open to traffic in 2026.	RR-1860
Negative impact on local businesses in the vicinity, including those in Winterbourne Stoke.	Whilst enhancing connectivity through improved journey times and journey time reliability, the improved A303 and bypass for Winterbourne Stoke would significantly improve the quality of village life through the significant reduction in traffic noise through the centre of the village along and close to the de-trunked A303. Further details of the noise benefits are provided in ES Chapter 9, Noise and Vibration [APP-047], Section 9.9. It would also improve the environment surrounding local businesses. The village, and all businesses, would be easily accessed from the new Longbarrow junction which would suffer less from congestion and delay. Further, the proposed new non-motorised user (NMU) routes would greatly increase east – west connectivity between Winterbourne Stoke and Amesbury, increasing accessibility for NMUs. The improvements to existing severance issues to and from Winterbourne Stoke which arise from the Scheme are set out in ES Chapter 13: People and Communities [APP-052].	RR-0361, RR-1008, RR-2306, RR-2174
Negative impact on tourism in Wiltshire.	In operation, the Scheme will make it easier for visitors to travel to Wiltshire and enjoy its attractions. The Case for the Scheme [APP-294] considers the tourism benefits of the Scheme. Temporary traffic management will ensure minimum additional disruption during construction consequently it is not anticipated that tourism will be affected in this period. This will be managed through a Traffic Management Plan, developed pursuant to paragraph 9 of Schedule 2 of the draft DCO [APP-020], which will include the details set out in item MW-TRA2 of the Outline Environmental Management Plan [APP-187], compliance with which is secured through paragraph 4 of Schedule 2 of the draft DCO.	RR-0295, RR-0229, RR-0539, RR-0731, RR-0762, RR-1233, RR-1185, RR-1014, RR-1141, RR-1597, RR-1624, RR-1683, RR-2247, RR-2359, RR-2314, RR-2193, RR-2016, RR-2351, RR-1364
More trees on route would be good.	Tree planting is proposed as appropriate to the landscape character through which the Scheme passes. For instance, tree planting is not proposed across the WHS because that would not reflect its open, rolling chalkland character and would be contrary to the WHS Management	RR-1834

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>Plan. Elsewhere tree planting is proposed where the scheme crosses the Till valley for instance. Further information can be found in Chapter 7 Landscape and Visual of the Environmental Statement [APP-045]. Paragraph 8 of Schedule 2 to the draft DCO [APP-020] requires Highways England to develop a landscaping scheme for approval by the Secretary of State, following consultation with Wiltshire Council. This Scheme must be based on the mitigation measures in the ES, which are set out in section 7.8, and set out the tree provision that is proposed for the Scheme.</p>	
<p>Many children travelling past Stonehenge itself will no longer have the opportunity to accidentally encounter world history of such significance, this combined with the fact that other hidden archaeology may be irreparably damaged, even destroyed, with no record of its existence.</p>	<p>The Scheme will transform the WHS landscape and all visitors, including children, will have the opportunity to experience and enjoy Stonehenge in an unspoiled setting, gaining a greater appreciation of the prehistoric landscape. They will be able to enjoy views from the new restricted byway on the line of the removed A303 rather than from a passing car. Extensive archaeological surveys have been and will continue to be carried out - all finds are being and will be fully recorded, adding to the knowledge of the WHS. Some will be put on public display.</p>	<p>RR-0870, RR-1843, RR-1654, RR-2182</p>
<p>The tunnel is going to be built to prevent people looking at Stonehenge for free. The only way to see Stonehenge would be to pay a fortune to English Heritage.</p>	<p>The tunnel is a fundamental part of the Scheme, designed to bring substantial benefits to the WHS by the removal of the sight and sound of traffic from the central part of the WHS. This inevitably means losing the view of Stonehenge from the A303 but the experience for visitors to the WHS will be considerably enhanced, whether accessing Stonehenge via the visitor centre or walking the wider landscape along one of the many publicly accessible byways. The old A303, publicly accessible from Winterbourne Stoke, Amesbury and connecting rights of way as well as via the Stonehenge visitor centre, will provide views of Stonehenge.</p>	<p>RR-0021, RR-0321, RR-0226, RR-0213, RR-0502, RR-0449, RR-0709, RR-0768, RR-1312, RR-1511, RR-1834, RR-1884, RR-1796, RR-2259, RR-2010, RR-1949</p>
<p>The Scheme has been designed for the benefit of passing motorists, not offering significant benefits to people in the local community.</p>	<p>The Scheme will not only benefit users of the A303, it will also provide significant benefits to local people. It will: provide a much-needed bypass for Winterbourne Stoke; reduce rat running and congestion on local roads, allowing local people to travel more easily; and allow people to gain greater enjoyment from the countryside, including the WHS, via the extensive improvements to the public rights of way network.</p>	<p>RR-0018, RR-0291, RR-0174, RR-0218, RR-0243, RR-0164, RR-0556, RR-0509, RR-0503, RR-0500, RR-0507, RR-0777, RR-0833, RR-0848,</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
		RR-1341, RR-1363, RR-1454, RR-1579, RR-1610, RR-0906, RR-0978, RR-1007, RR-1561, RR-1582, RR-1572, RR-1731, RR-1834, RR-1918, RR-1815, RR-1773, RR-2132, RR-2214, RR-1978, RR-1976, RR-2148, RR-2206, RR-2286, RR-2233, RR-2123
The introduction of new technology, such as driverless cars will render this project obsolete.	The Scheme is needed to cater for current and forecast traffic levels as described in the Transport Assessment [APP-297]. The impact of innovations such as driverless vehicles is not expected to affect the road networks for many years after the scheme would open (see section 5 of the Government's official road traffic forecasts (https://www.gov.uk/government/publications/road-traffic-forecasts-2018)).	RR-0021, RR-0111, RR-0100, RR-0072, RR-0372, RR-0597, RR-0842, RR-1451, RR-1493, RR-0926, RR-0941, RR-0951, RR-1051, RR-0892, RR-1758, RR-1918, RR-1654, RR-1645, RR-2079, RR-2304, RR-2000, RR-1963, RR-2265, RR-2208
This Scheme is not suited to people with disabilities.	The development of the Scheme has been supported by an Equalities Impact Assessment (EqIA) [APP-296], which is intended to ensure compliance with the Equalities Act 2010 (https://www.legislation.gov.uk/ukpga/2010/15/contents) and ensure that the project does not discriminate against or disadvantage any particular group of people. A key objective of the Scheme is to provide a positive legacy for communities and improve access both within and to the WHS. The new public rights of way (PRoW) proposed along the Scheme will not only maintain, but will also considerably enhance the existing PRoW network, significantly improving	RR-0059, RR-1485, RR-1610, RR-1731, RR-1834, RR-1636, RR-2121, RR-1782, RR-2214, RR-2152, RR-1976, RR-2221, RR-2007, RR-2162,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	connectivity for users. The EqIA indicates that disabled users may benefit from the new PRoW network and safer crossings proposed as part of the Scheme.	RR-2086
This scheme will cause disruption.	The A303 will remain in operation throughout construction and flows on local roads are not anticipated to change to any significant degree, as explained in chapter 9 of the Transport Assessment [APP-297]. Temporary traffic management measures will be needed at times and there will be close liaison with Wiltshire Council to determine the measures that can be best implemented to minimise any disruption, as part of a wider Traffic Management Plan which will be required to be developed pursuant to paragraph 9 of Schedule 2 to the DCO, and the Outline Environmental Management Plan [APP-187]; compliance with which is secured by paragraph 4 of Schedule 2 to the DCO.	RR-0013, RR-0327, RR-1501, RR-1593, RR-1628, RR-2268, RR-2255, RR-1953
There will be a negative impact on local tourism in Amesbury.	Rather than negative impacts, the Scheme will benefit local tourism by improving accessibility to Amesbury. Additionally, the new public rights of way proposals will provide ready access into the WHS from Amesbury for walkers, cyclists and horse riders, who will be able to enjoy the WHS landscape transformed by the removal of the existing A303 surface road and the associated sights and sound of traffic on it. Further information can be found in the Case for the Scheme [APP-294].	RR-1461
Effects on tourism need to be studied.	The tourism sector stands to benefit from the provision of an improved corridor to the South West and this benefit has been considered as one of the reasons why the Scheme is needed. At the same time, the Scheme will transform the WHS landscape around Stonehenge, enhancing the experience for visitors and contributing to this part of Wiltshire being an attractive tourist destination. Those involved in managing and developing the tourism sector will be able to pursue the accompanying opportunities. This is explained further in the Case for the Scheme [APP-294]. The Heritage Impact Assessment (HIA), ES Appendix 6.1 [APP-195], considers the implications of the Scheme in the context of Stonehenge and the WHS, concluding that the Scheme would bring about a slight beneficial effect on tourism. Tourists are also considered as users of public rights of way, visitors to the WHS and vehicle drivers in the People and Communities chapter and other relevant chapters of the ES (see Chapter 5 Air Quality, Chapter 6 Cultural Heritage, Chapter 7 Landscape and Visual and Chapter 9 Noise and Vibration) [APP038-054]. Impacts on the amenity of Public Rights of Way users which will include tourists in the vicinity of the Scheme are considered in the People and Communities Chapter with reference being had to the landscape and visual, noise and vibration and air quality assessments as relevant.	RR-0039, RR-0770, RR-1321, RR-1623, RR-0906, RR-2359, RR-1935, RR-2340, RR-1948, RR-2058

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Don't do it cheap, do it well.	<p>The Scheme will be delivered effectively and efficiently to deliver value for money. The Scheme was assessed against a number of alternatives, judging the benefits and dis-benefits of each proposal, to ensure that project costs were properly weighed in the balance with environmental, traffic, and wider issues.</p> <p>This process is explained further in the Case for the Scheme [APP-294] and Chapter 3 of the Environmental Statement [APP-041], and previously in the Technical Appraisal Report and Scheme Assessment Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).</p>	RR-0019, RR-0066, RR-0084, RR-0073, RR-0550, RR-0422, RR-0656, RR-1326, RR-1332, RR-1350, RR-0946, RR-0969, RR-1087, RR-1108, RR-1624, RR-1844, RR-2081, RR-1748, RR-1688, RR-2069, RR-2083, RR-1833
Stonehenge is a revered marker in the landscape.	Stonehenge will remain a revered marker in the landscape for those who wish to stop and enjoy the monument's transformed setting, free of the sight and sound of traffic.	RR-1342, RR-1486, RR-2323, RR-1775, RR-2118
Negative impact on local businesses in Amesbury.	By removing congestion and providing a reliable route between the South East and South West, the Scheme will provide an economic benefit to business at a local (including Amesbury), regional and national level. The placing of the A303 on a flyover at Countess roundabout will allow north – south traffic movement without any need to mix with traffic passing through the region, so making access into and out of Amesbury far easier for local traffic. Further information can be found in the Case for the Scheme [APP-294] section 5.3.	RR-2174
Any introduction of new construction within the WHS is against the management plan to protect the site.	In terms of the WHS Management Plan, Aim 6 within Section 11 of the Plan is to <i>"Reduce significantly the negative impacts of roads and traffic on the WHS and its attributes of OUV and increase sustainable access to the WHS"</i> . Section 11 actually anticipates and presumes the construction of a tunnel at least 1.8 miles (2.9km) long, subject to assessment, to achieve this aim, and does not preclude new construction within the WHS to achieve Aim 6. Moreover, the cultural heritage assessment, reported in ES Chapter 6 [APP-044], and the accompanying heritage impact assessment, in ES Appendix 6.1 [APP-195], set out the effects of the Scheme on the WHS and the overall benefits it will deliver.	RR-1029
Do not re-consider the southern F010 route – the current route selected is the	Thank you for your comment. There are no plans to reconsider the southern F010 route which has been discounted after an exhaustive review of route options. The process of options identification and route selection leading to the Scheme is summarised in Chapter 3	RR-1844

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
best.	(Assessment of alternatives) of the Environmental Statement [APP-041] (see in particular section 3.2 in respect of the F010 route) and further details can be found in the Technical Appraisal Report and Scheme Assessment Report, (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).	
The Scheme is a waste of money - do not build it.	<p>The Scheme is part of the Government's National Infrastructure Plan in which it has prioritised infrastructure investment for the UK against the competing demands from other public services. In its published Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), the Government has indicated its commitment to this Scheme as part of a programme of improvements needed to upgrade the A303/A358 route to a high-quality dual carriageway. The congestion problems on the A303 past Stonehenge are self-evident, as are other problems along the route. The need for improvement on this route was examined by a 2014 study commissioned by the Government. Based on its findings, the Government decided to include the upgrading of the A303 in its Road Investment Strategy. The improvement of the A303 past Stonehenge is part of a programme where eight schemes were identified as needing to upgrade the entire route where mile-a-minute journeys are the norm. Not pursuing the scheme would mean:</p> <ol style="list-style-type: none"> (1) The A303 would remain congested. (2) High volumes of traffic would continue to run along unsuitable local roads affecting the safety and quality of everyday life in local communities. (3) Poor connectivity to the South West would continue to drag down the region's economy. (4) The existing road past Stonehenge would continue to have an unacceptable impact on the OUV of the WHS. (5) Winterbourne Stoke would remain without the bypass it has been seeking for several decades. Assessment of the scheme, having regard to the transport, economic, heritage and community benefits that it delivers, has determined that it offers value for money. Further information can be found in the Case for the Scheme [APP-294]. 	RR-0134, RR-0059, RR-0278, RR-0588, RR-0367, RR-0585, RR-0654, RR-0687, RR-1370, RR-1167, RR-1431, RR-1525, RR-1483, RR-1557, RR-0921, RR-0959, RR-1543, RR-1658, RR-1898, RR-1652, RR-1918, RR-1722, RR-2258, RR-1846, RR-2291, RR-2073, RR-2144, RR-1738, RR-2130, RR-2112, RR-1923, RR-2007, RR-2047, RR-2289, RR-2233
The tunnel is only for English Heritage as part of the aim to take the view of Stonehenge	The Scheme is needed to address the problems on the A303 and is part of the Government's Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf).	RR-0195, RR-0187, RR-0490, RR-0493, RR-0449, RR-0500,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
away without paying for it.	<p>(le/408514/ris-for-2015-16-road-period-web-version.pdf) to upgrade the A303/A358 route to a high-quality dual carriageway. The tunnel solution has emerged as the optimum solution from extensive studies of a full range of alternative options. Surface solutions outside the WHS would not deliver the Scheme's objectives and it would not be possible to upgrade the A303 through the WHS without placing much of it in a tunnel. Whilst Stonehenge will not be visible from the A303 once the tunnel is built, there will be a significant opportunity for the public to view them from the enhanced public rights of way network, notably the restricted byway being created on the line of the existing road. Visitors will continue to have free access by using the public rights of way that cross the WHS landscape and via the National Trust's right to roam policy.</p>	RR-1269, RR-1495, RR-1457, RR-1458, RR-1595, RR-2136
The Scheme is a hostile act to those who hold the area sacred.	<p>The utmost care and consideration have been given to the impact of the Scheme on the WHS. Through the Applicant's public consultations and engagement, we have gained a wide range of diverse views. We have taken these on board in developing a solution which is both sensitive to and will deliver extensive benefits to the area.</p> <p>Furthermore, the Outline Environmental Management Plan (OEMP)[APP-187] sets out that construction of the scheme must be suspended (save for tunnelling related activities) during the winter and summer solstices, compliance with which is secured by paragraph 4 of Schedule 2 to the DCO [APP-030].</p>	For a list of RR that have raised this issue, please refer to Appendix C.
No single carriageway sections in the area should be left after the scheme is complete.	<p>As set out in its Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), the Government's aim is to upgrade all remaining single carriageway sections of the A303/A358 corridor into a high-quality dual carriageway route, improving connectivity to the South West. There is a programme of schemes along the corridor that will be pursued in the coming years to deliver the strategy.</p>	RR-1330, RR-1021
Scheme does not meet National Planning Framework Requirements.	<p>All national planning policy documents have been reviewed and a summary of relevant policy, including compliance with that policy, is set out in chapter 7 and Appendix A of the Case for the Scheme [APP-294] which accompanies the application.</p> <p>The National Policy Statement for National Networks (NPSNN) Accordance Table (Appendix A within the Case for the Scheme) provides a detailed analysis of compliance with the NPSNN. Under Section 104(3) of the Planning Act 2008, an application for Development</p>	RR-0894, RR-1050, RR-1567, RR-1907, RR-1814, RR-1659, RR-2324, RR-2294, RR-1896

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>Consent Order is required to be determined in accordance with the relevant National Policy Statement, except where the Secretary of State is satisfied one or more of the relevant clauses (Section 104 (4-8)) applies.</p> <p>Paragraph 1.17 of the NPSNN states that the NPPF will be an important and relevant consideration 'but only to the extent relevant to [the] project'. The Case for the Scheme document adequately considers any such relevance and compliance with NPPF policies by the Scheme.</p>	
Provide traffic calming and advanced works in Shrewton to stop motorists rat-running.	The Scheme will remove congestion from the A303 and will relieve local communities of rat running traffic that currently seeks to avoid the congestion on the A303 as described in the Transport Assessment [APP-297, Section 6.3.14]. The construction of the new Rollestone crossroads layout will discourage rat running through Shrewton. Any further measures such as traffic calming would be a matter for Wiltshire Council as the local highway authority.	RR-0361
What will be done to enhance the user experience in lieu of view of Stonehenge?	The user experience will be greatly enhanced by the Scheme removing congestion and providing a safer, high quality dual carriageway with quicker and more reliable journey times. The old A303 within the WHS will be converted to a public right of way which will significantly enhance the opportunity for people to explore the WHS and enjoy views of Stonehenge, including those who break their journey at this point, far more safely and enjoyably than from a vehicle travelling along a busy road.	RR-1024
This will block the views of Stonehenge, making it exclusively for those who have paid. This is wrong. This is our heritage.	A principal aim of the Scheme, supporting the aims of the World Heritage Site Management Plan 2015, is to remove the A303 and the sight and sound of traffic from much of the WHS landscape, thereby re-uniting Stonehenge with its surrounding monuments in their natural chalk downland setting. Whilst the Stonehenge monument will not be visible from the A303 once the tunnel is built, there will be a significant opportunity for the public to view it from the enhanced public rights of way network, notably the restricted byway being created on the line of the existing road. Visitors will continue to have free access by using the public rights of way that cross the WHS landscape and via the National Trust's right to roam policy.	RR-0098, RR-1654, RR-2258
The gouging out of 4 lanes of surface carriageway from the site can never be removed by future generations when they	The Scheme will deliver benefits for the WHS by placing two miles of A303 in a tunnel and transforming the WHS landscape around Stonehenge. The Scheme is assessed in the Heritage Impact Assessment [APP-195] to have a Slight Beneficial effect on the OUV of the WHS as a whole. This takes into account that of the seven attributes of OUV for the WHS, whilst the	RR-0021, RR-0209, RR-0266, RR-0375, RR-0396, RR-0770, RR-0824, RR-1172,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
decide it is inappropriate.	scheme will have a slight adverse effect on two of those attributes, it will have a beneficial effect on the remaining five (being a slight beneficial effect on 3 of the attributes, a large beneficial effect on one, and a very large beneficial effect on one). This conclusion also takes into account that the scheme will have a slight beneficial effect on the authenticity and integrity of the WHS. Overall, the OUV of the WHS would be sustained. If the A303 ever needs to be decommissioned, future generations will decide how that should best be done.	RR-1389, RR-1493, RR-1579, RR-1004, RR-1129, RR-1772, RR-1680, RR-0448, RR-2310
The Scheme does not re-unite the prehistoric landscape when there are roads all over it.	Placing the A303 in a 2-mile long tunnel will transform the WHS landscape around Stonehenge and enable people to access and connect between much of the Stonehenge prehistoric landscape. Replacement of the existing A303 with a restricted byway will allow the provision of new and enhanced public rights of way that will create greater access opportunities for people to enjoy the landscape.	RR-0839, RR-1527
Will the loss of view to travellers be reinstated with other viewpoints?	Travellers who stop and visit Stonehenge will be able to use the enhanced public rights of way network to enjoy views of the transformed WHS landscape. There will be no view of Stonehenge from the new A303 but there will be from the existing A303 once converted into a restricted byway.	RR-1829
It is not appropriate to use cost benefit techniques to justify cases such as this.	Appraisal is crucial to ensure decisions are fully informed and based on robust evidence. In this case, the appraisal helps demonstrate that the scheme offers value for money. The core method of appraisal, cost-benefit analysis, has been designed to inform comparison between options for interventions using public money. The appraisal methods are fully aligned to the Guidance issued by HM Treasury, the Department for Transport and Highways England.	RR-0034, RR-0048, RR-0525, RR-1205, RR-1149, RR-0935, RR-1050, RR-1670, RR-1654, RR-1651, RR-1844, RR-1923
Don't believe the Scheme is needed.	The Scheme is part of the Government's National Infrastructure Plan in which it has prioritised infrastructure investment for the UK against the competing demands from other public services. In its published Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), the Government has indicated its commitment to this Scheme as part of a programme of improvements needed to upgrade the A303/A358 route to a high-quality dual carriageway. The congestion problems on the A303 past Stonehenge are self-evident, as are other problems along the route. The need for improvement of the route was examined by a 2014 study commissioned by the Government. Based on its findings, the Government decided to include the upgrading of the A303 to a high-quality dual carriageway in its Road Investment Strategy. The improvement of the A303 past Stonehenge is	RR-0005, RR-0011, RR-0029, RR-0035, RR-0048, RR-0043, RR-0078, RR-0208, RR-0397, RR-0505, RR-0656, RR-0730, RR-0729, RR-0728, RR-0804, RR-0817, RR-1333, RR-1150, RR-1337, RR-1169, RR-1366, RR-1370,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>part the programme of eight schemes identified as being needed to upgrade the entire route to become a high-quality dual carriageway where mile-a-minute journeys are the norm. Not pursuing the scheme would mean:</p> <p>(1) The A303 would remain congested.</p> <p>(2) High volumes of traffic would continue to rat run along unsuitable local roads affecting safety and the quality of everyday life in local communities.</p> <p>(3) Poor connectivity to the South West would continue to drag down the region's economy.</p> <p>(4) The existing road past Stonehenge would continue to have an unacceptable impact on the OUV of the WHS.</p> <p>(5) Winterbourne Stoke would remain without the bypass it has been seeking for several decades.</p>	RR-1215, RR-1376, RR-1206, RR-1335, RR-1368, RR-1330, RR-1408, RR-0948, RR-0967, RR-1026, RR-1023, RR-1048, RR-1050, RR-1100, RR-1105, RR-1068, RR-1083, RR-1072, RR-1130, RR-1094, RR-1189, RR-1624, RR-1598, RR-1743, RR-1898, RR-1859, RR-1679, RR-1829, RR-1812, RR-1914, RR-1800, RR-1824, RR-1772, RR-1749, RR-1692, RR-1973, RR-1711, RR-1846, RR-1922, RR-0448, RR-1748, RR-1661, RR-2259, RR-2166, RR-2079, RR-2315, RR-1969, RR-2314, RR-2064, RR-2017, RR-1993, RR-2130, RR-2000, RR-2255, RR-1986, RR-2225, RR-2272, RR-1950, RR-2208, RR-1988, RR-2289, RR-1953
Keep the existing A303 open so that people can see	Keeping the existing A303 open past Stonehenge would retain the damaging impact that the existing road has on the OUV of the WHS. It would not remove the sight and sound of traffic from	RR-0348, RR-1896

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Stonehenge.	Stonehenge and other parts of the WHS and would not enable the opportunity to reconnect the northern and southern parts of the WHS, meaning that the Scheme objective of conserving and enhancing the WHS to make it easier to reach and explore would be unable to be met. The old A303 within the WHS will be converted to a public right of way which will significantly enhance the opportunity for people to explore the WHS and enjoy views of Stonehenge far more safely and enjoyably than from a vehicle travelling along a busy road.	
Improve the roads that access the Ratfyn Bridge.	Access improvements to the Ratfyn Bridge are not needed as part of the Scheme and are beyond its scope.	RR-1032, RR-2363
The speed limit on the de-trunked A303 from Winterbourne Stoke running east/west to the junction at Longbarrow, should be limited to 40mph.	The speed limits proposed in the DCO for this de-trunked section of A303 are 30mph through Winterbourne Stoke and 40mph from Winterbourne Stoke to Longbarrow Junction as detailed in draft DCO [APP-020] Schedule 10 Part 1 and as shown on sheets 3, 4 and 5 of the Traffic Regulation Measures Plans [APP-013].	RR-1977, RR-1980
The WHS could be turned into an archaeological research park, providing research projects for thousands of students and help us all understand our past.	This is outside of the scope of the Scheme and would more appropriately be considered by Historic England, Wiltshire Council Archaeology Service, English Heritage and National Trust, and others who have responsibility for managing the World Heritage Site.	RR-0487
I disagree with the calculation of monetised environmental benefits in particular landscape and heritage benefits.	The approach to the calculation of monetised environmental benefits is based on guidance issued by HM Treasury, the Department for Transport and the Department for Environment Food and Rural Affairs. There are well-understood limitations to the valuation of landscape benefits and so these estimates are not incorporated into the benefit cost ratio – instead they help to form a qualitative impression of the relative scale of landscape impacts compared to other impacts that are included in the benefit-cost ratio. The approach to the contingent (rather than direct) valuation of the heritage impacts of the Scheme (Appendix H of Appendix D to the Combined Modelling and Appraisal Report [APP-299] is based on best-practice techniques. It has been carefully quality assured and independently peer-reviewed so is considered the most robust estimate available. These approaches are consistent with published guidance and represent the most appropriate way to capture the value of these important benefits and make sure they are	RR-0837, RR-1621, RR-1898, RR-1683, RR-1732, RR-1661

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	fully accounted for in the judgement of the scheme's Value for Money.	
<p>There are many interventions the Government could take today to facilitate a rapid shift away from ever-increasing private transport towards public transport and solutions that benefit the common good including the health of our wider environment.</p>	<p>The National Policy Statement for National Networks (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/387223/npsnn-web.pdf) sets out the need for, and Government's policies to deliver, development of nationally significant infrastructure projects on the national road and rail networks in England. Compliance of the scheme with the requirements of the NPSNN, including those related to health and the wider environment, are shown in Appendix A of The Case for the Scheme [APP-294].</p> <p>The Government's Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf) sets out priorities for improvements to the strategic road network, consistent with the NNSPN. This document confirmed the improvement of the A303 between Amesbury and Berwick Down as a priority project.</p> <p>Having regard to the journeys being taken by those who use the A303, alternative transport measures (including rail improvements) would make little headway in addressing the specific problems identified - the proposed road improvement is needed to address the local and regional needs arising from the current issues with the road and to deliver the objectives set for the scheme, as explained in Appendix A paragraph 2.25 of the Case for the Scheme [APP-294] and section 8 of the Transport Assessment [APP-297]. The local PRow network is also being substantially improved as part of the Scheme proposals, improving transport choices for non-motorised users, and this is considered as assessed in the Environmental Statement Chapter 13, People and Communities [APP-051].</p>	<p>RR-0106, RR-0321, RR-0067, RR-0291, RR-0177, RR-0056, RR-0128, RR-0153, RR-0175, RR-0213, RR-0604, RR-0515, RR-0383, RR-0572, RR-0428, RR-0510, RR-0606, RR-0375, RR-0455, RR-0590, RR-0469, RR-0715, RR-0649, RR-0783, RR-0814, RR-0822, RR-0842, RR-1163, RR-1337, RR-1240, RR-1368, RR-1460, RR-1412, RR-1408, RR-0948, RR-1011, RR-1023, RR-1051, RR-1050, RR-0875, RR-0888, RR-1624, RR-1908, RR-1671, RR-1713, RR-1773, RR-1711, RR-1748, RR-1718, RR-1770, RR-1764, RR-2146, RR-2291, RR-2234, RR-1551, RR-1991, RR-2009, RR-2119, RR-1936, RR-2233</p>
This project will damage our	Stonehenge is an iconic monument and an international symbol of the UK. In recognition of its	RR-0261, RR-0181,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
country's reputation.	<p>importance, UNESCO inscribed the WHS in 1986 - one of the earliest inscriptions on the World Heritage Sites list and one of the first in the UK. By removing the sight and sound of traffic from the vicinity of Stonehenge, the Scheme presents an opportunity to deliver benefits for the WHS. In determining the route and developing the design for approval Highways England has been working closely with the UK statutory and scheme-relevant heritage bodies (Historic England, Wiltshire Council Archaeology Service, the National Trust and English Heritage Trust). It will continue to work with these bodies as the detailed design is developed and, subject to approval, the Scheme is built. The Scheme is assessed in the Heritage Impact Assessment [APP-195] to have a Slight Beneficial effect on the OUV of the WHS as a whole. This takes into account that of the seven attributes of OUV for the WHS, whilst the scheme will have a slight adverse effect on two of those attributes, it will have a beneficial effect on the remaining five (being a slight beneficial effect on 3 of the attributes, a large beneficial effect on one, and a very large beneficial effect on one). This conclusion also takes into account that the scheme will have a slight beneficial effect on the authenticity and integrity of the WHS. Overall, the OUV of the WHS would be sustained.</p>	RR-0301, RR-0472, RR-0467, RR-0455, RR-1230, RR-0917, RR-0953, RR-1012, RR-0870, RR-1563, RR-1797, RR-1760, RR-1838, RR-2314, RR-2221, RR-2265, RR-2129, RR-2286, RR-2197
The project has already been shown to be over budget.	<p>The Government is committed to the Scheme and its funding. Further detail on the funding of the Scheme is provided in the Funding Statement that accompanies the Application [APP-024] and its addendum submitted in the pre-Examination period [AS-0012].</p> <p>This commitment comes in the context of an estimate of costs for the Scheme submitted as part of the Application, that has had optimism bias applied to it; and is explained in Appendix D of the Combined Modelling and Appraisal Report [APP-302].</p>	RR-1610, RR-1636
Concerns about the lack of job creation for local people.	<p>As detailed in paragraph 13.9.87 of the Environmental Statement [APP-051], the construction of the Scheme is anticipated to provide additional direct and indirect employment opportunities in the local area.</p> <p>Chapter 5 of the Case for the Scheme [APP-294] demonstrates that, during operation, the Scheme would provide significant improvement to the Strategic Road Network (SRN) between Amesbury and Berwick Down by dualling the A303 and delivering other improvements such as improved connections with local roads. The Scheme would create appropriate capacity to cope with peak demand and growth on the SRN and provide a free flowing, safe, reliable and resilient network for the future which would support economic growth and associated job creation.</p>	RR-0360

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>Loss of the view from the road and need to pay to see Stonehenge in the future which is in breach of the conditions of Cecil Chubb's gift to the nation.</p>	<p>The tunnel is a fundamental part of the Scheme, designed to bring substantial benefits to the WHS. This inevitably means losing the view of Stonehenge from the A303, but the experience for visitors to the WHS would be considerably enhanced, and access would be readily and freely available via the new public right of way to be created along the old A303 through the WHS, accessible from Winterbourne Stoke, Amesbury and connecting rights of way, as well as via the Stonehenge visitor centre. Non-motorised visitors will continue to have free access by using the new and existing public rights of way that cross the WHS landscape as shown on sheets 5 to 9 of the Rights of Way and Access Plans [APP-009] and via the National Trust's right to roam policy.</p>	<p>For a list of RR that have raised this issue, please refer to Appendix C.</p>

4 Draft Development Consent Order, Consultation and Process

4.1 Overview

- 4.1.1 A total of 150 interested parties raised matters regarding the draft development consent order, consultation and process in their relevant representations.
- 4.1.2 Table 4-1 provides a summary of the key issues raised in relation to the draft development consent order, consultation and process, alongside a response from Highways England.

Table 4-1: Draft Development Consent Order, Consultation and Process

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
The consultation was flawed as the information provided was inadequate and therefore insufficient to properly inform.	<p>Consultation was undertaken in accordance with the Statement of Community Consultation, which was subject to consultation with the Local Planning Authority and Planning Act 2008 statutory requirements. Information about the scheme proposals was available online, at public events and local deposit locations. Staff were on hand at exhibitions to talk through the proposals. The material published for statutory consultation was based on the information available at that time and was sufficient to satisfy the purpose of gaining feedback on the scheme proposals and for that feedback to be taken into consideration as part of the continuing development of the scheme up to the time of submitting the DCO application. In addition to the consultation booklet, the information provided included the Preliminary Environment Information Report (PEI Report) and its non-technical summary, as well as plans of the proposals. Further details of the approach, engagement and outcomes of the consultation is presented in the Consultation Report [APP-026].</p> <p>In deciding to accept the application, the Planning Inspectorate will have had regard to the adequacy of the consultation undertaken by the Applicant, and to the nine adequacy of consultation responses received from local authorities, who confirmed that they considered the consultation had been carried out adequately, in accordance with the relevant statutory requirements.</p>	RR-0017, RR-0059, RR-0098, RR-0389, RR-0445, RR-0646, RR-1408, RR-0870, RR-0883, RR-1898, RR-1758, RR-1740, RR-2121, RR-1870, RR-1661, RR-1934, RR-2214, RR-2227, RR-2162, RR-2293, RR-2108, RR-2354, RR-1606, RR-2345
No information has been given	Images were designed to provide an indicative visual representation of the overall Scheme at the	RR-1621, RR-1683

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>on crucial elements such as signage, lighting, gantries and emergency laybys. We consider the images of the Scheme misleading in this respect.</p>	<p>time of consultation and further detail is provided within the plans and drawings comprising volume 2 of the DCO application [APP-004 to APP-019].</p> <p>Laybys will be provided along the new road (outside the tunnel) with a spacing in line with Highways standards as shown indicatively on the General Arrangement Drawings [APP-012]. Outside the tunnel, 1.0m wide hard strips will be provided along each side of each carriageway as shown in the Engineering Section Drawings (Cross Sections) [APP-011]. Within the tunnel, a 1.5 metre wide emergency walkway will be provided [APP-011 sheet 9].</p> <p>The majority of the Scheme will not be lit. Road lighting is proposed at three locations only: in the tunnel; under Green Bridge No. 4 (day time only) and at Countess roundabout. This lighting is provided for in the Outline Environmental Management Plan (OEMP) [APP-187] (D-CH9 to D-CH12), and paragraph 4 of Schedule 2 of the DCO [APP-020] requires the scheme to be carried out in accordance with the OEMP. In terms of infrastructure visibility within the WHS, the Scheme has committed to no signage or other vertical installations (such as CCTV) above the top of the cutting and no lighting of signs at the western end of the Scheme in order to protect the WHS's OUV (OEMP [APP-187] (D-CH8)). Appropriate signage and infrastructure will also be provided outside the WHS to manage traffic through the corridor.</p>	
<p>Thank you for the opportunity to comment on the proposals.</p>	<p>Thank you for taking an interest in the proposals.</p>	<p>RR-0839, RR-1046, RR-1043, RR-1789</p>
<p>Concern that those who don't agree with proposals may be successful in blocking it.</p>	<p>The application for development consent will be considered via an examination by the Planning Inspectorate on behalf of the Secretary of State, during which the public will be able to make representations and participate in hearings (as appropriate). Following the examination, the panel of inspectors charged with examining the application will make a recommendation to the Secretary of State based upon all the information and evidence available to them. The views of those who don't agree with the proposals, and the reasons for that disagreement, will be considered alongside other consultee responses, and the other information and evidence presented, as well as relevant policy requirements. The final decision on the scheme will be made by the Secretary of State for Transport.</p>	<p>RR-0023</p>
<p>Concerned that views won't be</p>	<p>All views previously expressed in response to the consultation have been considered and taken</p>	<p>RR-0017, RR-0222,</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
listened to, given serious consideration or not addressed to satisfaction.	into account as set out in the Consultation Report [APP-026]. The Scheme is now subject to an examination by a panel of inspectors, who will make a recommendation to the Secretary of State for Transport. The views of all those who have an interest in the Scheme will be considered during the examination, as well as information and evidence presented, and the relevant policy requirements. The final decision on the Scheme will be made by the Secretary of State for Transport.	RR-0457, RR-1239, RR-1394, RR-1075, RR-1108, RR-1732, RR-1688
The content of the public consultation materials was, in some areas, factually incorrect or misleading, and therefore difficult to understand.	The material published for statutory consultation was sufficient to satisfy the purpose of gaining feedback on the Scheme proposals and for that feedback to be taken into consideration as part of the continuing development of the Scheme up to the time of submitting the DCO application. As part of the continuing development of the Scheme following statutory consultation, a supplementary consultation was carried out on three specific design changes and the opportunity was also taken to clarify the public rights of way proposals along the scheme. Booklets prepared to support the above consultations were written in plain English and made use of images and photographs with the intention of making them accessible to a wide audience. Non-technical summaries were also provided for the environmental information presented. Highways England made every attempt to ensure the consultation materials were easy to understand. There were a small number of instances of incorrect labelling of an image or map; these did not affect the content of the information provided in the consultation materials and do not amount to the consultation being misleading. Highways England is therefore of the view that the consultation was effective and robust in order to inform consultees and seek their views on the proposals.	RR-0017, RR-0389, RR-1159, RR-1621, RR-1898, RR-1732, RR-2121, RR-1661, RR-2288, RR-1954, RR-2162, RR-2293, RR-1947, RR-1896
Public exhibition locations were not extensive enough as they were mostly held within Wiltshire.	Public exhibition events were held in locations which reflected the impact and interest of the Scheme to local communities and customers. These were agreed with Wiltshire Council as host local authority. Reflecting wider interest, an exhibition was also held in central London. The consultation was also advertised extensively, using national and local media, and the material was available on the scheme website for the wider audience. In deciding to accept the application, the Planning Inspectorate will have had regard to the adequacy of the consultation undertaken by the Applicant, and to the nine adequacy of consultation responses received from local authorities, who confirmed that they considered the consultation had been carried out adequately, in accordance with the relevant statutory requirements.	RR-1896
Disappointed that suggestions / outcomes of previous consultations have been	All feedback received from the 2017 non-statutory consultation was considered, as set out in the report on that consultation (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/results/report-on-consultation---volume-1.pdf). This feedback was also summarised	RR-0261, RR-0733, RR-1758, RR-1824, RR-1817, RR-1661,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
ignored.	<p>in Chapter 2 of the Consultation Report [APP-026].</p> <p>Feedback from the 2018 statutory and supplementary consultations has also been considered and is reported in Chapters 5 and 6 of the Consultation Report [APP-026]. Many diverse views were expressed and not all suggestions received could be incorporated into the Scheme proposals.</p>	RR-1982, RR-2205, RR-1896
Don't understand the purpose of consultation if the outcome is predetermined and views won't make a difference.	The outcome of consultation or of the application is not pre-determined and views expressed can and do make a difference to the development of the scheme proposals, as set out in the Consultation Report [APP-026]. The Scheme will also be subject to an examination by an independent panel of Inspectors, who will make a recommendation to the Secretary of State for Transport. The Secretary of State will make the final decision on whether the Scheme receives consent.	RR-1394, RR-1518, RR-2288
Information is lacking to properly assess the environmental impacts of the scheme.	A full environmental impact assessment has been undertaken and the results reported in the Environmental Statement (ES) [APP-039 – 054] accompanying the DCO application. Legislation is in place which prescribes what the ES must include in order that the Examining Authority, the Secretary of State and interested parties can understand the likely significant effects of a development. Each topic assessment in the ES for the Scheme has been carried out in accordance with the relevant legislation and policy, as set out in the Legislative and Policy Framework section of each chapter, and, where relevant, in consultation with the relevant statutory and non-statutory environmental bodies, as summarised in the Consultation section of each topic chapter. The Applicant considers that sufficient environmental information in relation to the Scheme has been provided in order to allow people to understand its likely significant effects. In accepting the application for Examination, the Planning Inspectorate will have considered the adequacy of the ES.	RR-0637, RR-1610, RR-2086
Listen to the opinions of people who live locally or are directly affected by the Scheme.	All views expressed in response to the consultation, including the views of local people, were considered and taken into consideration as set out in the Consultation Report [APP-026]. The DCO examination process provides a further opportunity to express views and make representations about the Scheme. Local views are also continuing to be heard via the Local Community Forum that has been established for representatives of community bodies/groups to engage about the Scheme.	RR-0981, RR-0983, RR-1895
No public discussion on	An options appraisal was carried out in 2016 and 2017, with more than 60 route options	RR-0870, RR-1918,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
whether there should actually be a tunnel. The presentation seems heavily weighted towards a presumption to go ahead with a tunnel.	considered, leading to a non-statutory consultation in 2017. The non-statutory public consultation explained why non-tunnel route options would not deliver the Scheme's objectives. Detailed information on the options appraisal process is set out within Chapter 3 [APP-041] of the Environmental Statement and in the Technical Appraisal report. (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).	RR-2134, RR-1954, RR-1947, RR-2201, RR-2088, RR-2220
Pleased that previous consultation responses have been acted upon.	Thank you for your comment.	RR-1041, RR-1879
Need to have regard to the advisory missions and the reports. What is the risk of having World Heritage status removed? This information has been deliberately withheld from the consultation.	<p>The recommendations of the UNESCO/ICOMOS missions carried out in 2015, 2017 and 2018 and the subsequent decisions of the World Heritage Committee have been considered carefully and aspects of the design have been altered to address their recommendations. The World Heritage Committee decision with regards to the scheme not proceeding in its current form refers to the scheme as was set out at public consultation in March 2018. The Scheme design has evolved substantially since that date, as put forward in the supplementary consultation and following that, the DCO application.</p> <p>UNESCO/ICOMOS recommendations and World Heritage Committee decisions have informed the development of the scheme throughout its development and its design responds to these including: the route alignment selected as the preferred route avoiding the winter solstice sunset alignment and the bisecting the Diamond Group; setting the road in deep retained cuttings to minimise landtake; determining the length of the tunnel to avoid the Scheduled Monument known as the Avenue (NHLE 1010140) at its eastern end and a Bowl barrow south of the A303 and north west of Normanton Gorse (NHLE 1010832) at its western end – the tunnel length has been extended to 2 miles (or 3km) in length; the further addition of 200m of canopy at the western portal and 85m of canopy at the eastern portal to further extend the tunnel (to almost 3.3km) to aid landscape integration; the optimization of the positions of the tunnel portals at the head of dry valleys in the landscape; in order to reduce the length of cutting (and minimise the length of the culvert part of the tunnel in the western approaches) the addition of the 150m long land bridge to maintain physical and visual connectivity between the Winterbourne Stoke Crossroads Barrows and the Diamond Group; the removal of the surface A303 into a tunnel and approach cuttings to reduce noise and improve the tranquillity of the WHS; in order to minimise light spill measures have included no lighting of the new Longbarrow Junction or the approach cuttings, new</p>	RR-0468, RR-0743, RR-1088, RR-0870, RR-1564, RR-2053

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>directional lighting at Countess Junction replacing the existing non-directional lighting, lighting of the portals and canopies would be designed to minimise light spill out in to the WHS landscape and lighting under the land bridge will only operate during daylight hours; and to minimise the visibility of new infrastructure within the WHS signage and other highways installations will sit completely within the approach cuttings and not extend above them. Further information on the missions, including how Highways England has considered the recommendations of UNESCO/ ICOMOS can be found in the Consultation Report [APP-026], Chapters 2 and 3.</p> <p>Following submission of the DCO, UNESCO has been notified of the application. It is expected that The State of Conservation Report (SOCR) prepared by the Department for Digital, Culture, Media & Sport will be considered at the next meeting of UNESCO's World Heritage Committee, scheduled for summer 2019.</p> <p>Engagement with the World Heritage Centre will continue through the detailed design and construction of the scheme.</p> <p>The impact of the scheme in terms of the inscription of the WHS is assessed in Section 12.5 of the HIA and concludes that the scheme would not impact upon the continuing relevance and application of the WHS inscription criteria, and in fact the scheme will bring extensive benefits to the WHS. The scheme was most recently considered by the World Heritage Committee at its meeting in June 2018 - there has been no indication that World Heritage status might be removed.</p> <p>In terms of the information provided during consultation, the preliminary environmental information report (PEIR) provided an overview of ICOMOS, their role in relation to the scheme, and described at a high level the past and future proposed engagement with them. The PEIR also presented a conclusion that the scheme would maintain the OUV of the WHS. There has also been no withholding of information – the mission reports and subsequent decisions of the World Heritage Committee are available via UNESCO's own website at: https://whc.unesco.org/en/list/373/documents/</p>	
Staff attending the events did	Public exhibitions were hosted by a team of experts, and Highways England sought to have	RR-0098

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
not have detailed knowledge and were vague on the issues that matter including noise and local footpaths.	people on hand, able to respond to questions on different topics such as: design; traffic; noise; heritage; statutory process; and others. Inevitably all members of staff cannot be expert in all areas and people were re-directed wherever possible to a team member better able to answer a question.	
There needs to be a fresh consultation process to provide the public with a genuine range of options that cause no further harm to the WHS.	Proposals for the improvement of the A303 between Amesbury and Berwick Down have been the subject of extensive study and consultation since 1991. The process of options identification and route selection leading to the Scheme is summarised in Chapter 3 of the Case for the Scheme [APP-294], in Chapter 3 [APP-041] of the Environmental Statement, and further details can be found in the Technical Appraisal Report and the Scheme Assessment Report (https://highwaysengland.citizenspace.com/cip/a303-stonehenge/). The Scheme has been developed from an extensive process to identify an optimum solution that represents a significant investment by the Government which will address the congestion problems on the A303 and deliver extensive benefits for the WHS.	RR-0349, RR-0586, RR-0824, RR-1124, RR-0870, RR-1758, RR-1899, RR-1918, RR-1688, RR-2296
Very nice artists' impressions of the roads and tunnel portals, but totally unrealistic without the indication of the essential road furniture that will be installed, e.g. road direction signs, warning and restriction signs, information gantries, safety barriers and fencing, roadside refuges/hard shoulders, etc.	The images presented at statutory consultation were provided to give a representation of how the scheme could look. As set out in Section 7.3 of the Landscape and Visual Impact Assessment [APP-045], the first year of the operational phase of the Scheme (year1), has considered lighting, signage, traffic lights, boundary treatments and planting. Further details of laybys and fencing on the approach to the tunnel portal is provided on the structures drawings [APP-017]. Full details of road furniture and signage will be developed at the next stage in the Scheme's design.	RR-1278
Communities need to be kept informed of the progress of the project.	Those respondents who have requested to be kept informed will continue to be informed of the scheme's progress. Information will also be available on the scheme website as well as on the Planning Inspectorate's website during the Examination.	RR-0473
As an organisation with an interest in the scheme, we are keen to be engaged throughout the development of	Following the application for development consent, anyone with an interest in the Scheme has had and will continue to have an opportunity to be involved in the public examination of the Scheme proposals. This process is managed by the Planning Inspectorate and people have had the opportunity to register as interested parties as part of making relevant representations through the Inspectorate website, Parties can also be involved in the process even if they are not	RR-1741, RR-1977, RR-1980, RR-1864, RR-2233

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
the proposals.	registered officially as interested parties. Highways England will also continue to engage with stakeholders and the local communities.	
Incorrect information presented in the consultation materials.	<p>The material published for statutory consultation was sufficient to satisfy the purpose of gaining feedback on the Scheme proposals and for that feedback to be taken into consideration as part of the continuing development of the Scheme up to the time of submitting the DCO application. There were a small number of instances of incorrect labelling of an image or map; these did not affect the content of the information provided in the consultation materials. Highways England is therefore of the view that the consultation was effective and robust in order to inform consultees and seek their views on the proposals.</p> <p>In deciding to accept the application, the Planning Inspectorate will have had regard to the adequacy of the consultation undertaken by the Applicant, and to the nine adequacy of consultation responses received from local authorities, who confirmed that they considered the consultation had been carried out adequately, in accordance with the relevant statutory requirements.</p>	RR-1337, RR-2134, RR-2220
Stakeholder comments should be included in full in the application to show transparency of views.	Whether made by stakeholder bodies or individual members of the public, all comments have been summarised in the Consultation Report [APP-026] submitted as part of the DCO application. Statutory consultee bodies have been named where they have made the summarised comment. In all other instances, anonymised reference numbers have been allocated to those making the comments. If the Planning Inspectorate wishes to see the full responses behind the comments, the allocated references will be used to provide the responses.	RR-1898, RR-1918
This project and Stonehenge itself is of local and international importance – make sure everyone that has a view can express it.	The Scheme is recognised as being of national importance – it is designated as a nationally significant infrastructure project. In the context of the WHS and the internationally iconic status of Stonehenge, the Government has decided to make a significant investment in a scheme which will deliver extensive benefits for the WHS. The Scheme was the subject of extensive consultation both in relation to the selection of the preferred route and a consultation and supplementary consultation on the proposals that are the subject of the application for development consent. All views made have been taken into account as part of the development of the scheme as explained in the Consultation Report [APP-026]. The process of the application for development consent means that the scheme is now subject to an examination by a panel of inspectors, who will make a recommendation to the Secretary of State for Transport. The views of all those who have an interest in the scheme will be considered during the examination, with	RR-0211, RR-0181, RR-0123, RR-0228, RR-0222, RR-0277, RR-0434, RR-0824, RR-1278, RR-1207, RR-1230, RR-0915, RR-0984, RR-0977, RR-1007, RR-0870, RR-0877, RR-1562, RR-1796, RR-1808, RR-2223,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	opportunities for interested parties to make representations at hearings and in writing. The Secretary of State will make the final decision on whether the scheme receives consent.	RR-2132, RR-2286
Need to ensure compliance with the Wiltshire Core Strategy (WCS) and within the context of relevant National Policy Statement (NPS) on infrastructure delivery and the wider planning context provided by the National Planning Policy Framework (NPPF). Ensuring 'agreements' and 'orders' are included in the submission.	All national and local planning policy documents have been reviewed and a summary of relevant policy, including compliance with that policy, is set out in the Case for the Scheme [APP-294] which accompanies the application. The National Networks National Policy Statement (NNNPS) Accordance Table (Appendix A within the Case for the Scheme) also provides a detailed analysis of compliance with the NNNPS. The DCO application included the draft Development Consent Order (DCO) [APP-020] which includes all relevant provisions to enable the scheme to be constructed, operated and maintained.	RR-0034, RR-0743, RR-1504, RR-1683, RR-1661, RR-2160, RR-2209, RR-1896
Ensure major road users are not affected during construction by conducting full engagement with them during the development process	Major road users have had, and a number took, the opportunity, via the statutory consultation and relevant representations, to comment on the scheme proposals. Following the DCO application for development consent, anyone with an interest in the scheme now has an opportunity to be involved in the public examination of the scheme proposals. During construction, the existing A303 will remain open until traffic can be switched to the new road and any temporary traffic management needed to accommodate construction works will be planned and implemented in a way that minimises any disruption. Regular scheme updates will also be publicised during construction to inform major road users in their journey planning.	RR-1864
The consultation period was too short.	<p>The consultation ran for a period of 75 days. This is substantially in excess of the 28 day minimum required period and provided a significant amount of time for the public to consider and submit their views on the Scheme proposals.</p> <p>In deciding to accept the application, the Planning Inspectorate will have had regard to the adequacy of the consultation undertaken by the Applicant, and to the adequacy of consultation responses received from local authorities, who confirmed that they considered the consultation had been carried out adequately, in accordance with the relevant statutory requirements.</p>	RR-1453, RR-0870
The comments of consultees	The Planning Act 2008 required us to consider all comments that we received through our	RR-0222, RR-1758,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
were not taken on board.	statutory consultation. The Consultation Report [APP-026] sets out the comments that we received and our responses, including whether or not the Scheme was changed in response to the comments and the reasons why. In deciding to accept the application, the Planning Inspectorate has considered that the Consultation Report was adequate and demonstrated that regard has been had to consultation responses.	RR-1680, RR-2105
As an organisation we have no comment on this scheme.	Thank you for your response.	RR-0850
Lack of detail in DCO application. The Secretary of State has inadequate information to enable him to make a decision on this application.	<p>The application for development consent submitted by Highways England was accepted by the Planning Inspectorate, on behalf of the Secretary of State for Transport, who, after the 28-day formal acceptance period, concluded that it met the standards required to progress to examination. As part of the consideration to formally accept the application for examination the Secretary of State needed to have been satisfied that the application documents contained adequate information on the Scheme.</p> <p>The application for development consent will now be considered via an examination by a panel of examiners appointed from the Planning Inspectorate, during which the public will be able to make representations and participate in hearings (as appropriate). The examination process allows for information to be provided by all parties, through a series of hearings, written questions and representations. Following the examination, the panel of examiners charged with examining the application will make a recommendation to the Secretary of State based upon all the information and evidence available to them.</p>	RR-0059, RR-0790, RR-0839, RR-1504, RR-1898, RR-1683, RR-1782, RR-1661, RR-1976, RR-2160, RR-2329, RR-2286, RR-1536
A virtual reality model of the scheme should be made available to allow people to more fully understand what the scheme will look like and what the impacts will be. In particular, this would be valuable in the western section of the WHS.	Thank you for the suggestion. The project team will continue to investigate methods of promoting the project to the public and will be looking at how both virtual reality and augmented reality technologies could help people visualise the Scheme better.	RR-2329
I'm writing to declare my	The Planning Inspectorate will contact all those who have submitted relevant representations and	RR-0785, RR-0812,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
interest in the project and my intention to develop my interest further through examination.	declared an interest in the project through updates ahead of and during the examination. This includes providing information on dates for hearings during which the public will be able to make oral representations and participate (as appropriate). The Planning Inspectorate will also provide opportunities to submit written representations and to respond in writing to the documents submitted by other parties (including the applicant) during the examination.	RR-1179, RR-1394, RR-1459, RR-0942, RR-1010, RR-1003, RR-0866, RR-0886, RR-1907, RR-1801, RR-1912, RR-1726, RR-1634, RR-1855, RR-1681, RR-1978, RR-2154, RR-2209, RR-2147, RR-1947, RR-0890
DCO process timelines are inadequate.	<p>In accordance with the Planning Act 2008 and its associated Regulations, the Examining Authority sets the timetable and what form the examination will take at, or as soon as practicable after, the Preliminary Meeting. All interested parties and statutory parties will be informed of the examination timetable once finalised. There is a statutory requirement for the entire examination process to be completed within 6 months, and this is therefore reflected in the examination timetable.</p> <p>The Preliminary Meeting is held to discuss procedural matters only and is held in public. The procedural decision made after the Preliminary Meeting will be published on the Planning Inspectorate website and will confirm the timetable for the examination. The examination timetable will, amongst other things, set deadlines for receipt of detailed written representations and for comments on the relevant representations made by other interested parties.</p>	RR-1209, RR-0881, RR-1898, RR-1782, RR-1661, RR-2288, RR-2303, RR-2306, RR-2134, RR-2201, RR-2088, RR-2220, RR2373AS
We have nothing further to add to the comments we made at consultation.	We have had regard to the comments previously made, as set out in the Consultation Report [APP-026] submitted as part of the application for development consent, which contained feedback received during consultation and Highways England's response to the feedback received.	RR-0840
Why are statutory bodies in favour of the scheme?	While Highways England has engaged and continues to engage with the relevant statutory bodies in the development of the Scheme, it is unable to comment on the decisions or decision-making processes of the statutory organisations.	RR-2209
Wording in consultation	It is not agreed that the materials suggest the whole of the WHS would be available for	RR-2288, RR-2303,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>literature implied that, with the tunnel scheme, the whole of the WHS is available for exploration including private land.</p>	<p>exploration, including within private land. The applicant considers that the consultation materials did not imply that private land would be accessible. Where Public Rights of Way designations were unclearly labelled in the consultation materials for Statutory Consultation, these were clarified as part of the supplementary consultation.</p> <p>Once the tunnel is in place, a key objective of the Scheme is to enhance public access and connectivity to and through the WHS. To achieve this, the scheme is creating a number of new restricted byways, including along the route of the old A303, while maintaining the existing network. Beyond the creation of new byways, the Scheme is not seeking to alter existing byway designations, nor is it seeking to provide access on to or through private land. For reference, the existing Public Right of Way network is illustrated on ES Figure 13.2 [APP-180] and the proposed new restricted byways on ES Figure 13.3 [APP-181].</p>	<p>RR-2134, RR-2201, RR-2088, RR-2220</p>
<p>The Inspectors should insist that design, treatment and mitigation statements are contractually agreed and included within the DCO. These statements should include: soil and substrata protection; management and aftercare; site compounds (limitation of use and reinstatement); fencing specifications; field and road drainage; public rights of way; and private points of access.</p>	<p>The detail, development and implementation of the design of the Scheme and its mitigation measures will be secured by requirements within the DCO, which will be binding on Highways England and any of its contractors in the construction, operation and maintenance of the scheme. Highways England will separately ensure compliance with relevant requirements via contractual obligations on main and sub-contractors, as described in paragraphs 2.3.61 and 2.3.62 of the Environmental Statement (ES) [APP-040].</p> <p>In terms of securing the design of the Scheme, the draft DCO [APP-020] sets constraints (limits of deviation) for the Scheme and allows for a proportionate amount of flexibility for certain aspects of the Scheme. Limits of deviation are necessary because development consent is being applied for whilst the Scheme is still at the preliminary / reference design stage. Mitigation is secured in the Outline Environmental Management Plan (OEMP) [APP-187], implementation of which is secured by paragraph 4 of schedule 2 of the draft Development Consent Order [APP-020], in relation to geology and soils (PW-GEO1, PW-GEO2 and MW-GEO1 to10, which includes a requirement for a soils management strategy), restoration and aftercare of agricultural land (MW-COM4), general site management provisions including in relation to site compounds and hoarding / fencing of compounds (MW-G26-30), various provisions in relation to fencing (see for example specific requirements associated with heritage assets at Table 2.2, MW-CH1, MW-CH3, PW-CH1, PW-CH4), and drainage (PW-WAT2, MW-WAT3, MW-WA14, and in relation to water runoff, drainage more generally at MW-WA7). Changes to existing, or creation of new,</p>	<p>RR-2108, RR-2354, RR-1606, RR-2345</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	public rights of way and private accesses are secured by the development consent order and are shown on the Rights of Way and Access Plans [APP-009].	
Widespread opposition and apparent project overspend indicates a high risk of judicial review.	<p>As detailed in Section 2.1 of the Funding Statement [APP-024], the Scheme has a capital cost estimate of £1.7 billion including allowances for risk and inflation.</p> <p>Whilst the Scheme enjoys strong support from key heritage bodies and Wiltshire Council, along with other local authorities and the local enterprise partnerships in the South West, there are a range of views regarding the benefits offered by the Scheme. However, public opposition or cost increase, without appropriate grounds, would not be a reason for a successful judicial review. The process by which the application for development consent for the Scheme will be considered is an inquisitorial process, conducted via an examination by an independent panel of inspectors on behalf of the Secretary of State. During the examination the public will be able to make representations and participate in hearings (as appropriate). Following the examination, the panel of inspectors will make a recommendation to the Secretary of State based upon all the information and evidence available to them. The views of those who don't agree with the proposals, and the reasons for that disagreement, will be considered alongside other consultee responses, and the other information and evidence presented, as well as relevant policy requirements. The final decision on the scheme will be made by the Secretary of State for Transport.</p>	RR-0059, RR-1610, RR-1731, RR-1834, RR-2121, RR-1782, RR-2214, RR-1976, RR-2162
There is a conflict of interest in the decision-making process as English Heritage, as site owner, Highways England, as Promoter, and the Planning Inspectorate, as decision maker, are all government agents. An independent body should be identified to reach conclusions on this proposal.	<p>English Heritage is a charitable trust that looks after the national heritage collection and is not a Government agency.</p> <p>Highways England is a government-owned company responsible for England's strategic road network and is regulated by Transport Focus and the Office of Rail and Road who hold the organisation to account on behalf of the public.</p> <p>Whilst the Planning Inspectorate is a government agency its fundamental values are its commitment to openness, transparency and impartiality in the conduct of its business.</p> <p>Given the separate structures of the above three parties and the fundamental values of openness transparency and impartiality of the Planning Inspectorate, it is not accepted that there is any</p>	RR-1408, RR-2353

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	conflict of interest or that further independence is required in the assessment of the application.	
Lack of confidence in the DCO process/ statutory planning	<p>The DCO process is undertaken in a transparent and fair manner, in accordance with strict statutory requirements.</p> <p>The application for development consent submitted by Highways England was accepted by the Planning Inspectorate, on behalf of the Secretary of State for Transport, who, after the 28-day formal acceptance period, concluded that it met the standards required to progress to examination. The application for development consent will now be considered by a panel of examiners (the Examining Authority) appointed by the Planning Inspectorate on behalf of the Secretary of State. During the examination process Interested Parties (who have registered by making a Relevant Representation) can provide more details of their views in writing and at public hearings. The Examining Authority will consider all important and relevant matters, including the representations of all Interested Parties, supporting evidence submitted and answers to the Examining Authority's questions set out in writing or posed at hearings, before making a recommendation to the Secretary of State. The Secretary of State will then make the final decision as to whether to approve the application.</p>	RR-0457, RR-2286, RR2371AS
The consultation ignores the government's commitments under the 1974 World Heritage Sites Act.	<p>The applicant is not aware of the piece of legislation being referred to, and has assumed this is a reference to the World Heritage Convention. In full recognition of its obligations under the Convention Concerning the Protection of the World Cultural and Natural Heritage (UNESCO 1972) (the World Heritage Convention) the Government is making a substantial investment in funding a tunnel past Stonehenge to bring extensive benefits to the WHS.</p> <p>The application has been prepared (and the consultation on it undertaken) with due regard to the obligations under the World Heritage Convention.</p> <p>The protection and conservation of World Heritage Sites, in line with the World Heritage Convention, is integrated into the comprehensive UK legal and policy framework in connection with the assessment and consideration of harm to heritage assets. As a result, great weight is given to harm to World Heritage Sites. The application by the Secretary of State of the planning balance envisaged by this framework and, in particular, the NPSNN is in accordance with the WHC.</p>	RR-0870

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>The Heritage Impact Assessment (HIA) [APP-195] (submitted as part of the application) assesses the impact of the proposed Scheme on the Attributes that convey the OUV of the WHS, their Integrity and Authenticity, as well as the alignment of the Scheme with the vision, aims and policies of the 2015 WHS Management Plan and the criteria for the site's inscription as a WHS. The HIA concludes that the overall effect on the OUV of the WHS would be slight beneficial and the OUV will be sustained by the construction of the Scheme.</p>	
<p>Lack of alternative options in consultation that would not damage the World Heritage Site.</p>	<p>Overall, the Scheme would have a slight beneficial effect on the WHS as a whole and would sustain the Outstanding Universal Value of the WHS as summarised in Section 12.4 of the Heritage Impact Assessment, in ES Appendix 6.1, HIA [APP-195].</p> <p>Proposals for the improvement of the A303 between Amesbury and Berwick Down have been the subject of extensive study and consultation since 1991. The process of options identification and route selection leading to the Scheme is summarised in the Case for the Scheme [APP-294], section 3.2 and in Chapter 3 of the ES [APP-041], Assessment of Alternatives, in compliance with the requirements of Schedule 4 of the EIA Regulations 2017. Further details can be found in the Technical Appraisal Report and the Scheme Assessment Report (at: https://highwaysengland.citizenspace.com/cip/a303-stonehenge/). The Scheme has been developed from an extensive process of options appraisal, including the consideration of options which avoided the World Heritage Site altogether, to identify the optimum solution, representing a significant investment by the Government aimed at addressing the congestion problems on the A303 and delivering extensive benefits for the WHS. Further details on the options and route selection can be found in the Technical Appraisal Report and the Scheme Assessment Report (at: https://highwaysengland.citizenspace.com/cip/a303-stonehenge/).</p> <p>In relation to the consideration of alternatives, the National Policy Statement for National Networks (paragraph 4.27) states:</p> <p><i>".....Where projects have been subject to full options appraisal in achieving their status within Road or Rail Investment Strategies or other appropriate policies or investment plans, option testing need not be considered by the examining authority or the decision maker. For national road and rail schemes, proportionate option consideration of alternatives will have been</i></p>	<p>For a list of RR that raised this issue, please refer to Appendix D.</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p><i>undertaken as part of the investment decision making process. It is not necessary for the Examining Authority and the decision maker to reconsider this process, but they should be satisfied that this assessment has been undertaken."</i></p> <p>The assessment has been undertaken in accordance with the process as set out above.</p>	

5 Design – Countess Junction, Green Bridge No. 4, Longbarrow Junction and River Till Viaduct

5.1 Overview

- 5.1.1 This chapter is related to the main design elements of the proposed scheme. These comprise of the Countess junction, Green Bridge No.4, Longbarrow junction and the River Till viaduct.
- 5.1.2 A total number of 20 interested parties raised matters regarding the design of Countess junction in their relevant representations. 7 interested parties raised matters regarding the design of Green Bridge No.4 in their relevant representations. 17 interested parties raised matters regarding the design of Longbarrow junction in their relevant representations. 18 interested parties raised matters regarding the design of the River Till viaduct in their relevant representations.
- 5.1.3 Table 5-1 provides summaries of the key issues raised in relation to the design of Countess junction, Green Bridge No.4, Longbarrow junction and River Till viaduct, alongside a response from Highways England.

Table 5-1: Design – Countess Junction, Green Bridge No.4, Longbarrow Junction and River Till Viaduct

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
The flyover is unattractive.	Your comment is noted. The final design of the flyover will be determined during detailed design, following Highways England's guide 'The Road to Good Design' to secure an aesthetically pleasing appearance (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf). More information on the design approach can be found in the Design and Access Statement [APP-295]. Details of visual assessment can be found in the Environmental Statement, Chapter 7, Landscape and Visual Impact Assessment [APP-045], in Section 7.9.	RR-0009, RR-1693, RR-1929
I would like more information on the design of the Countess flyover.	There will be a new junction between the A303 and A345 at the existing Countess roundabout, designed with reference to the guidelines and recommendations given in the Design Manual for Roads and Bridges (DMRB). The new junction will be grade-separated, meaning that through	RR-0142, RR-0562

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>traffic using the A303 would not need to stop at the roundabout, as is currently the case. The A303 will be carried on a flyover, comprising two bridges with a central landscaped embankment, approximately seven metres above the existing roundabout, with slip road connections (using the existing dual carriageway roundabout entry and exit lanes) accommodating all movements to and from the A345. A visualisation of the flyover is provided in ES Figures 7.67 [APP-145] and 7.68 [APP-146], with proposals for landscaping and planting of the flyover embankments secured through requirement 8 of the draft DCO [APP-020]. There is sufficient room within the existing highway boundary for the construction of the flyover, without the need for additional land to be acquired. Existing access to the Countess Services would be maintained on the north-east side of the junction. The detailed design of the junction will be developed at the next stage of the design process and Wiltshire Council will be consulted on the design development for the elements for which they will become responsible. More information on the approach to design can be found in the Design and Access Statement, section 6.5 [APP-295].</p>	
<p>The flyover will generate too much noise and pollution and is too visually intrusive. Landscaping and planting should be used for screening.</p>	<p>The potential impacts of Countess flyover are assessed in the relevant topic chapters of the Environmental Statement (ES), including Chapter 5, Air Quality [APP-043], Chapter 7, Landscape and Visual [APP-045], Chapter 9, Noise and Vibration [APP-047], and Chapter 13, People and Communities [APP-051], and Chapter 15, Cumulative Effects [APP-053]. The assessment reported in the ES has concluded that there would be: no significant adverse impacts on air quality; temporary significant adverse visual effects on nearby residents during construction, a permanent adverse visual effect on one residential property during operation; and temporary significant adverse noise effects for nearby residents during construction. The cumulative effects assessment found that in-combination there would be a significant adverse visual, noise and air quality effect during the construction and operational phases at Countess Farm. During construction, sensitive receptors in the vicinity of the Countess roundabout will be afforded protection through measures contained within the Outline Environmental Management Plan (OEMP) [APP-187] to, for example, control noise (PW-NOI1, PW-NOI3, PW-NOI5, MW-NOI1, MW-NOI3 MW-NOI4, and MW-NOI6), dust (PW-AIR1 and MW-AIR1), and artificial lighting (MW-G29). The OEMP is secured through paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020]. Operational mitigation will be delivered through 1.8m high noise barriers on the north and south sides of the flyover, as required by reference D-NOI2 in the OEMP; and landscaping of the flyover embankments would be secured through requirement 8 of the draft DCO [APP-020].</p>	<p>RR-0025, RR-0009, RR-0562, RR-0870, RR-2200, RR-1929, RR-1954, RR-1536, RR-1792</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Provide a noise barrier on both sides of the flyover.	In mitigation of predicted levels of traffic noise, the design of the Countess flyover has been developed to include a noise barrier 1.8 metres high on both its north and south sides. Further information can be found in the Environmental Statement Chapter 9, Noise and Vibration [APP-047], in Section 9.8. The barrier is secured through the OEMP [APP-187], reference D-NOI2, which in turn is secured by requirement 4 of Schedule 2 to the draft DCO [APP-020].	RR-1693
Ensure traffic signals are provided for pedestrians and cyclists at Countess.	The precise form of non-motorised user (NMU) crossing will be confirmed during detailed design. At this stage, it is anticipated that this will include signalised road crossings to provide safe crossing points for pedestrians and cyclists, preserving north/south connectivity along the A345 and enabling pedestrians and cyclists to pass beneath the A303 flyover above. Further information on this safe crossing provision can be found in the Environmental Statement Chapter 2: The Proposed Scheme [APP-040], paragraph 2.3.24, and the Design and Access Statement [APP-295], Paragraph 6.5.6.	RR-2283
How easy is it for users of the Countess Services, or coming from Amesbury to join onto the flyover if there is fast-flowing traffic on the A303?	Traffic from Amesbury or Countess Services will be able to access the A303 easily and safely via slip roads from the new Countess Junction. This is achieved by the Scheme being designed to the standards defined in the Design Manual for Roads and Bridges (DMRB). Further information can be found in the Design and Access Statement [APP-295], Section 3.4, paragraphs 3.4.13 and 3.4.14, and Section 6.5, paragraph 6.5.4 and 6.5.5. These works are shown on sheet 9 of the Works Plans [APP-008] and are described in Schedule 1 of the draft DCO [APP-020] under the description of Work No. 1H.	RR-0858
How will the access to the Amesbury Services be maintained as this is accessed directly off the East bound carriageway straight after the roundabout?	Access to the services will be retained in its current arrangement, with the current eastbound carriageway of the A303 exit from Countess roundabout becoming the new eastbound on-slip to the A303 under the new junction layout. The existing retained access points are shown as unaffected, as shown on the Rights of Way and Access Plans [APP-009], Sheet 9 of 15.	RR-0858
You say that you have discounted raising the A345 or lowering the A303 at the Countess junction. Has a compromise of partial lowering of the A303 and part raising	It has long been anticipated that an A303 flyover would be built at Countess. When the roundabout was initially built, it was future-proofed; the shape and size of the existing roundabout and the layout of the existing entry/exit roads were designed and built to allow for the A303 to go over the A345. For more details, see the Design and Access Statement, [APP-295] section 6.5.5. If the A345 were raised to pass over the A303, even partially, this would require additional land (currently outside the highway boundary) to be taken from properties bounding	RR-1053

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
the A345 been considered?	the A345, to accommodate the rising road level. It would be a significant visual intrusion close to these properties and access to many would be lost. Lowering the A303 would have a significant impact on this sensitive environmental area, particularly on the groundwater regime adjacent to the River Avon SSSI/SAC.	
Objection to proposal at Countess Roundabout.	As set out in the Department for Transport's Road Investment Strategy for the 2015/16 – 2019/20 Road Period (published March 2015) (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), the Government made a commitment to upgrade the remaining single carriageway sections of the A303/A30/A358 corridor to a high-quality dual carriageway. The proposed Scheme follows current highway design standards, recommendations and guidelines as given in the Design Manual for Roads and Bridges (DMRB). Consequently, given the forecast traffic flows, a grade-separated junction will be provided at Countess roundabout; the main objective of the grade-separated design is to provide a junction which is safe for the associated traffic flows and operates effectively within capacity. The new junction arrangement will also accommodate local accesses via the A345 and pedestrian and cyclist movements via signalised crossing points.	RR-0012, RR-0871
The flyover will have harmful effects on the environment and important heritage sites.	The potential environmental and heritage impacts of the proposed Countess flyover are considered in the relevant topic chapters of the Environmental Statement (ES), including Chapter 5 Air Quality [APP-043], Chapter 6, Cultural Heritage [APP-044], Chapter 7 Landscape and Visual [APP-045], Chapter 9, Noise and Vibration [APP-047] and Chapter 13 People and Communities [APP-051]. The assessment reported in the ES has concluded that there would be: no significant adverse impacts on air quality; temporary significant adverse visual effects on nearby residents during construction; a permanent significant adverse visual effect on residents of Countess Farm during operation; and temporary significant adverse noise effects for nearby residents during construction. During construction, sensitive receptors in the vicinity of the Countess roundabout will be afforded protection through measures contained within the Outline Environmental Management Plan (OEMP) [APP-187] to, for example, control noise (PW-NOI1, PW-NOI3, PW-NOI5, MW-NOI1, MW-NOI3 MW-NOI4, and MW-NOI6), dust (PW-AIR1 and MW-AIR1), and artificial lighting (MW-G29). Operational mitigation will be delivered through 1.8m high noise barriers on the north and south sides of the flyover, as required by reference D-NOI2 in the OEMP; and landscaping of the flyover embankments would be secured through requirement 8 of the draft DCO [APP-020].	RR-0870, RR-1536

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>In terms of heritage, there would be significant effects on Grade II-listed buildings at Countess Farm and non-significant effects on the settings of Amesbury Abbey Registered Park and Garden. During construction, heritage assets in the vicinity of the Countess roundabout would be afforded protection through measures to, for example, control noise, dust, and artificial lighting contained within the OEMP.</p> <p>Compliance with the OEMP is secured by requirement 4 of the draft DCO [APP-020].</p>	
<p>The flyover will effectively cut the town in half, causing increased severance.</p>	<p>Grade-separating the A303 and A345 will remove congestion from the Countess roundabout. It will reduce severance by enabling local people to travel freely north-south on the A345 without conflict with traffic on the A303. Local people will also be able to travel freely, without delay, on the A303 itself. New surface-level pedestrian/cycle crossings will be introduced around the junction to improve connectivity across the roundabout junction on the A345 beneath the flyover. The potential for the Scheme to cause severance is considered through the People and Communities assessment, Environmental Statement Chapter 13 [APP-051], which concludes that the removal of through-traffic from the roundabout and the replacement of the existing non-motorised user (NMU) underpass with an at-grade signalised NMU crossing would improve connectivity, resulting in a minor beneficial effect, as concluded in paragraph 13.9.35 of Chapter 13.</p>	RR-1693
<p>Countess Roundabout is next to our premises (located in the industrial estate near Solstice Park). Any increase in this area of traffic and delays would considerably impact the business during the construction.</p>	<p>The A303 will remain in operation throughout construction and traffic flows on local roads are not anticipated to change to any significant degree, as shown in the Transport Assessment [APP-297], Section 9.5. Temporary traffic management measures will be needed at times and there will be close liaison with Wiltshire Council to agree how the measures can be best implemented to minimise any disruption. The requirement for the contractor to prepare a Traffic Management Plan, in consultation with Wiltshire Council and for the approval of the Secretary of State, is secured through paragraph 9 of Schedule 2 of the draft Development Consent Order [APP-020]. An assessment of potential impacts on businesses (private assets) on or near the Scheme is set out in the Environmental Statement Chapter 13, People and Communities [APP-051], The assessment has concluded, as set out in Section 13.9, that there would be no adverse effects on private assets within the industrial estate near Solstice Park.</p>	RR-1864
<p>Countess Flyover will cause significant impacts in terms of noise, air quality and visual</p>	<p>The potential impacts of Countess flyover are considered in the relevant topic chapters of the Environmental Statement (ES), including Chapter 5, Air Quality [APP-043], Chapter 7, Landscape and Visual [APP-045], Chapter 9, Noise and Vibration [APP-047], and Chapter 13,</p>	RR-0562, RR-1706, RR-2283, RR-1536,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
intrusion for nearby residents and wildlife.	<p>People and Communities [APP-051]. The assessment reported in the ES has concluded that there would be: no significant adverse impacts on air quality; temporary significant adverse visual effects on nearby residents during construction reducing to a permanent adverse visual effect on just one residential property, during operation; and temporary significant adverse noise effects for nearby residents during construction. During construction, sensitive receptors in the vicinity of Countess roundabout will be afforded protection through measures contained within the Outline Environmental Management Plan (OEMP) [APP-187] to, for example, control noise (PW-NOI1, PW-NOI3, PW-NOI5, MW-NOI1, MW-NOI3 MW-NOI4, and MW-NOI6), dust (PW-AIR1 and MW-AIR1), and artificial lighting (MW-G29). The OEMP is secured through paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020]. Operational mitigation would be delivered through 1.8m high noise barriers on the north and south sides of the flyover (MW-NOI2), and landscaping of the flyover embankments, in accordance with requirement 8 of Schedule 2 to the draft DCO ([APP-020]. The potential for the flyover to have impacts on wildlife is set out in ES Chapter 8, Biodiversity [APP-046]. The assessment, set out in Section 8.9, has concluded that there would be no significant adverse impacts on ecological receptors.</p>	RR-1792
How will Countess junction be constructed in the shortest possible time to avoid impact on traffic?	<p>The detailed construction methodology will be developed by the Contractor as part of its detailed design. It is currently anticipated that the flyover will be constructed while keeping the existing roundabout, adjacent NMU routes and road lighting in operation, albeit with reduced lane availability at times. During construction of the new bridges and approach ramps, it will be necessary to divert the adjacent footways. Where the diversion routes cross the A303, this will be done either using temporary signal-controlled crossings or by provision of a temporary bridge. Further detail, including construction sequencing, defining working hours, noise mitigation measures in such locations to seek to keep all effects to a practicable minimum, and temporary route locations will be developed by the appointed contractor to minimise the timescale and level of any disruption to traffic flows and non-motorised users (NMUs) during this period as far as reasonably practicable.</p> <p>Requirement 9 of the draft DCO [APP-020], requires the Secretary of State's approval, following consultation with Wiltshire Council, of a Traffic Management Plan for each part of the Scheme before construction of that part commences. The Outline Environmental Management Plan (OEMP) [APP-187] includes on pages 65-66 (items MW-TRA1&2) the outline requirements of the Traffic Management Plan, and on page 38 (item MW-G31) sets out that the contractor shall</p>	RR-2283

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	take reasonable steps to engage with nearby residents regarding the carrying out of the construction works. The OEMP will be secured under paragraph 4 of Schedule 2 within the draft DCO [APP-020].	
<p>There is a requirement to underground an existing overhead electricity line (currently running through the proposed eastern compound) which needs to be diverted partly beneath the Amesbury services. Until such time as further details are known it is difficult to predict the potential impact but there is concern regarding the location of the underground cable bearing in mind the presence of underground fuel tanks on site. In addition, there will be concerns on the impact the undergrounding of the cable will have on trade together with concerns regarding access for public, staff members and deliveries which need to be maintained at all times.</p>	<p>The extent of these works will be finalised in detailed design in liaison with Scottish and Southern Energy Networks (SSEN). SSEN are currently investigating the capacity of their network in the area to see if the amount of works in this area can be reduced. Highways England will continue to liaise with the landowner and occupiers in respect of the details of these works, taking account of the communication and notification processes set out in the draft DCO [APP-020] and the Outline Environmental Management Plan (OEMP) [APP-187].</p>	RR-0858
<p>The Countess flyover will impact nearby properties due to increased noise, light and dust. More tree planting and screening is needed than is</p>	<p>The potential impacts of Countess flyover are assessed in the relevant topic chapters of the Environmental Statement (ES), including Chapter 5, Air Quality [APP-043], Chapter 7, Landscape and Visual [APP-045], Chapter 9, Noise and Vibration [APP-047], Chapter 13, People and Communities [APP-051], and Chapter 15, Cumulative effects [APP-053]. The assessment reported in the ES has concluded that there would be: no significant adverse</p>	RR-0562, RR-1594, RR-1584, RR-1792

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
currently proposed.	<p>impacts on air quality, including in relation to dust; temporary significant adverse visual effects on nearby residents during construction; a permanent adverse visual effect on one residential property during operation; and temporary significant adverse noise effects for nearby residents during construction. The cumulative effects assessment found that in combination there would be a significant adverse visual, noise and air quality effect during the construction and operational phases at Countess Farm.</p> <p>To aid in the integration of the Scheme into the landscape and to provide visual screening, tree planting is being undertaken within Countess roundabout and between the flyover and the slip-roads where space permits, which would be provided as part of the landscaping mitigation to be implemented pursuant to paragraph 8 of Schedule 2 to the draft DCO [APP-020]. Ultimately, however, the flyover, slip roads and drainage measures being situated within the existing highway boundary and as such the extent of this area is fixed and does not afford space for additional tree planting or screening beyond that which has been included within the application. Regarding additional screening, the height of the noise barriers on the flyover was chosen to reduce the adverse noise impacts whilst minimising the potential for visual impacts associated with the screens themselves. During operation, the potential traffic noise impacts will be further reduced through the use of a low noise road surface, as set out in the Outline Environmental Management Plan (OEMP) [APP-187], D-NOI1, which is secured through paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020]. During construction, sensitive receptors in the vicinity of Countess roundabout will be afforded protection through measures contained within the OEMP, for example, to control noise (PW-NOI1, PW-NOI3, PW-NOI5, MW-NOI1, MW-NOI3 MW-NOI4, and MW-NOI6), dust (PW-AIR1 and MW-AIR1), and artificial lighting (MW-G29).</p>	
Adequate signage will need to be provided on both carriageways of the A303 informing road users of the Countess service station as it will no longer be visible from the carriageways.	As stated within Chapter 6.2 of the Design and Access Statement [APP-295], Paragraph 6.2.8, the detail of traffic signage to be included within the Scheme will be determined during the detailed design process, which is the next stage in the Scheme's development. This work will include consideration of necessary signage requirements for the existing service stations.	RR-0858

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>Concern about the use of the Countess Services access road by construction traffic using the proposed adjacent compound. Adequate signage will need to be provided to ensure no HGV's stray onto customer areas and it may be necessary to put other protocols in place to protect the existing users of the site. In addition, there is a concern that use of the site by HGV's and other construction traffic will lead to a deterioration of the site both in terms of damage caused to roads and also potential impact of increased fumes and smoke from construction vehicles.</p>	<p>Chapter 2 of the Environmental Statement (ES) [APP-040] sets out the approach to the construction of the Scheme, including details of the construction compounds, and the movement of construction vehicles to and within the site. An indicative construction layout, including the location of proposed compounds and haul routes, can be found in ES Figure 2.7 [APP-061].</p> <p>As much construction traffic movement as possible will be contained within the operational construction site boundaries. Precise details on the movement of construction traffic and the transport of materials have yet to be determined but Highways England's appointed contractor will be required to comply with requirements set by the DCO regarding construction traffic management, which provide that no part of the authorised development is to commence until a traffic management plan (TMP) has been submitted to and approved in writing by the Secretary of State, following consultation with the local highway authority (see DCO Schedule 2, Requirement 9 [APP-020]). The TMP will be developed with reference to the Traffic Management Act 2004 and New Roads and Street Works Act 1991 and will include the requirements for a TMP set out in the Outline Environmental Management Plan (OEMP), as presented in the Environmental Statement Appendix 2.2 [APP-187], measure MW-TRA2. A Traffic Control Officer will be appointed to manage the TMP as set out in Table 2.1 in the OEMP. The potential impacts associated with construction traffic, including air quality impacts, would be mitigated through the implementation of measures in the OEMP relating to the control of dust and fumes from the movement of construction traffic on roads. The OEMP is secured by requirement 4 of the draft DCO [APP-020]. In relation to the use of Countess Services, access will be maintained to the Services during construction.</p>	RR-0858
<p>Green Bridge No. 4 is not wide enough to completely resolve concerns about visual impacts on the WHS and the OUV.</p>	<p>Green Bridge No.4 was moved eastwards and widened from 50m to approximately 150m in order to provide greater physical and visual connectivity between the Winterbourne Stoke Crossroads Barrows and the Diamond Group and, in particular, the two upstanding long barrows in each group in this western part of the WHS. The retained cutting in the western approaches allows visual connectivity to be maintained between the Winterbourne Stoke Crossroads Barrows, the Diamond Group and the Normanton Down Barrows that contribute to the OUV of the WHS, as agreed with heritage stakeholders. The design of the retained cutting incorporates an upper grassed slope and chalk grassland mitigation to the north and south. This allows the cutting to blend into the surrounding landscape from key views between monument groups. The Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole. This</p>	RR-2329

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	takes into account that of the seven attributes of OUV for the WHS, whilst the Scheme will have a slight adverse effect on two of those attributes, it will have a beneficial effect on the remaining five (being a slight beneficial effect on 3 of the attributes, a large beneficial effect on one, and a very large beneficial effect on one). This conclusion also takes into account that the Scheme will have a slight beneficial effect on the authenticity and integrity of the WHS. Overall, the OUV of the WHS would be sustained.	
There should be a green bridge along the line of the A360 as well as in the WHS.	Following the statutory consultation, the location of the bridge was confirmed to be within the WHS and was widened to approximately 150 metres. The proposal to widen the bridge was among three changes put forward for the supplementary consultation summarised in Chapter 6 of the Consultation Report [APP-026]. There is no justification for constructing a further bridge in such close proximity to the WHS on the line of what will become the redundant section of the A360, which will be replaced by a restricted byway and private means of access.	RR-0820
Optimum visual interplay between monuments is questionable due to topography.	The Scheme has been developed to reduce the visual intrusion of new highway sections within the WHS and between monuments and monument groups (ES Chapter 6, Cultural Heritage, Section 6.8, paragraph 6.8.5) [APP-044]. Additionally, important viewpoints for understanding the OUV of the WHS were discussed and agreed with HMAG (ES Chapter 6, Cultural Heritage, Appendix 6.1, paragraphs 5.3.38 – 5.3.40) [APP-044], as were the location and form of Green Bridge No. 4, which will replicate the existing topography.	RR-2288, RR-2134, RR-2201, RR-2088, RR-2220
The new junction should be further away from the WHS, i.e. moved west.	<p>The location and design of the new Longbarrow junction have been selected to give an optimum balance between achieving an efficient connection with the A360 and reducing impacts on Winterbourne Stoke, the WHS and the surrounding landscape. Details of the development of the location and layout of Longbarrow Junction in the context of environmental and heritage considerations are provided in ES Chapter 3, Assessment of Alternatives [APP-041], Section 3.3 (Paragraphs 3.3.33 to 3.3.41).</p> <p>For further information on design development refer to the Design and Access Statement, [APP-295] Section 6.3, Paragraphs 6.3.18, to 6.3.22.</p>	RR-1722
Provide a safe crossing for NMUs south of Longbarrow southern roundabout.	The precise form of non-motorised user (NMU) crossing south of the new Longbarrow southern roundabout will be confirmed during detailed design; at this stage it is anticipated that this will be facilitated through the use of Pegasus crossings (signal-controlled crossings adapted for both pedestrian and equestrian use).	RR-0380

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	For further information, refer to the Design and Access Statement [APP-295], Chapter 6.3 Paragraph 6.3.19. The proposed route of the NMU provision within the Scheme is shown on the Rights of Way and Access Plans [APP-009] which show the Longbarrow southern roundabout on sheet 5.	
The Longbarrow junction design won't cope with traffic levels during busy periods.	The Longbarrow junction has been designed to accommodate all predicted traffic flows, including heavy flows at peak periods. Information on traffic modelling assessments of the junction capacity can be found in the Transport Assessment [APP-297], Section 6.7.	RR-1021
The junction is harmful to the environment.	Longbarrow junction forms an important part of the overall Scheme, which will deliver many environmental benefits, including: for the WHS landscape; for ecological connectivity; for Winterbourne Stoke; and for the nearby communities that are currently affected by high levels of rat-running traffic. The location and design of Longbarrow junction have been selected to give an optimum balance between achieving an efficient connection with the A360 and reducing impacts on Winterbourne Stoke, the WHS and the surrounding landscape. Full details of the design development process are set out in the Environmental Statement (ES), in Chapter 3, Assessment of Alternatives [APP-041], section 3.3. Full details of all the environmental effects can be found in the Environmental Statement [APP-038 to APP-054]. The case for the Scheme is set out in the Case for the Scheme and NPS Accordance [APP-294], which includes information about the benefits which the Scheme would deliver.	RR-0637
Leave the site alone / objection to the Longbarrow junction proposals.	The proposed grade-separation of Longbarrow junction is a key element of the Scheme, designed to deliver a free-flowing strategic east-west route along the A303 as well as to deliver environmental benefits, including: for the WHS landscape; for ecological connectivity; for Winterbourne Stoke; and for the nearby communities that are affected by high levels of rat-running traffic. Full details of all the environmental effects can be found in the Environmental Statement [APP-038 to APP-054]. The case for the Scheme is set out in the Case for the Scheme and NPS Accordance [APP-294], which includes information about the benefits which the Scheme would deliver.	RR-1423
Ensure safe and easy access is provided from the A360 for landowners.	Where landowners have existing access to the A360, and that access is affected by the Scheme, the access will be re-provided. The stopping up and replacement of private means of access is shown on the Rights of Way and Access Plans [APP-009]. Those private means of access connecting to the A360 are shown on sheets 5, 14 and 15 of the Rights of Way and Access	RR-2108, RR-2354, RR-1606, RR-2345

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	Plans and are described in Schedule 3 to the draft DCO [APP-020]. Article 10 of the draft DCO requires Highways England to provide a replacement access, or a temporary access pending completion of the replacement access, before an existing private means of access is permanently stopped up.	
Concerns over archaeology at the junction location. It deserves to be preserved and treated with extreme care, rather than regarded as without consequence.	Archaeological considerations have been afforded the highest priority throughout the development of the Scheme, informing the choice of preferred route and influencing the design of the Scheme, geared towards delivering its objective to 'help conserve and enhance the WHS'. Full details of the design development process are set out in the Environmental Statement (ES) in Chapter 3, Assessment of Alternatives [APP-041]. This is the reason for the substantial investment in a 2-mile long tunnel. Optimising the junction's location has included taking into consideration the results of archaeological surveys undertaken to determine the presence/absence of archaeological remains in the area. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction. The Outline Archaeological Mitigation Strategy (OAMS), Appendix 6.11 of the ES [APP-220] outlines the principles of archaeological mitigation and also identifies areas to be protected in situ. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage), and is secured by paragraph 5 of Schedule 2 to the draft Development Consent Order [APP-020]. Details of how the archaeology has been considered and assessed can be found in the Environmental Statement, Chapter 6, Cultural Heritage [APP-044]; in particular Section 6.8 and Table 6.9 which details design measures taken to avoid and preserve archaeological remains as far as is practicable.	RR-0637, RR-0806, RR-1389, RR-2359, RR-2048, RR-1040
Avoid/minimise the use of any road lighting as much as possible.	The Scheme proposals include minimal road lighting. There will be no road lighting at the Longbarrow junction, with the Scheme removing the existing lighting at Longbarrow roundabout. Nor will there be any lighting along the open road inside or outside the WHS. The existing lighting at Countess roundabout will be replaced with a modern lighting system, as outlined in Environmental Statement Chapter 2 [APP-040]. Design measures related to lighting are secured in the Outline Environmental Management Plan [APP187], references D-CH9, D-CH10, D-CH11 and D-CH12, compliance with which is secured by requirement 4 of Schedule 2 to the draft DCO [APP-020]. These are significant improvements over the current situation, where both Countess and Longbarrow junctions are brightly lit. With traffic passing through a 2-mile long tunnel, the	RR-2114

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	Scheme will reduce light pollution in the WHS and will help to preserve the dark sky environment throughout the year. The potential impact of the Scheme upon dark skies is considered in the Heritage Impact Assessment [APP-195], Section 9.3, paragraphs 9.3.13 – 9.3.19, which concludes that the Scheme would have a Moderate Positive impact on this aspect of the WHS, resulting in a Large Beneficial effect.	
Not clear how access will be provided to the car park and new Stonehenge visitor centre.	Motorised vehicle access from the A303 to the Stonehenge Visitor Centre will be along the A360 via the new Longbarrow junction. Access from the A360 will be via the Airman's Cross roundabout as is currently the case. Non-motorised users can travel to the Stonehenge Visitor Centre site via the proposed restricted byway route parallel with the A360 (labelled references U and UA as shown on sheet 14 of the Rights of Way and Access Plans [APP-009]). Highways England is in discussions with English Heritage, who operate the Stonehenge Visitor Centre, on the arrangements for the new restricted byway.	RR-1100
Longbarrow junction is too expensive.	A grade-separated junction is essential to achieving a core objective of the Scheme, to deliver a free-flowing and reliable connection to the South West. The specific location and design of the junction have been optimised to deliver on a number of requirements such as minimising impact on the WHS, separating traffic moving north-south from the strategic network traffic travelling east-west, and facilitating NMU access. Details of the development of the location and layout of Longbarrow Junction in the context of environmental and heritage considerations are provided in ES Chapter 3, Assessment of Alternatives [APP-041], Section 3.3 (Paragraphs 3.3.33 to 3.3.41). For further information on design development refer to the Design and Access Statement, [APP-295] Section 6.3, Paragraphs 6.3.18, to 6.3.22.	RR-2249
Will the design of the new junction dissuade traffic from rat-running through Shrewton when heading northwest from the A303?	Yes, the Scheme will reduce travel times along the A303 past Winterbourne Stoke, making it quicker for northwest-bound traffic to get to Warminster via the A36 rather than by the B390. This is anticipated to reduce traffic levels through Shrewton, with traffic levels on the B390 west of Shrewton predicted to reduce by 1600 vehicles per day in 2041. Further details of the traffic impacts of the scheme can be found in the Transport Assessment [APP-297], at Section 6.3.11.	RR-1546
The viaduct is too high/ lower the viaduct. Every effort should be made to lower it including increasing the gap between the split decks.	The primary driver for the height of the viaduct is the minimisation of shading on the below River Till SSSI and the adjacent grassland habitat, part of the River Avon SAC. A viaduct of this height, with the gap between the decks, is essential to ensure that sufficient sunlight reaches the valley floor to maintain existing vegetation and thereby protect the integrity of the SSSI and River Avon SAC. Lowering the viaduct, even with increasing the gap, would create too much shade over the SSSI and the surrounding habitat. The height of the proposed viaduct has been informed by a	RR-1008, RR-1047

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	Bridge Shading Study and Assessment, as set out in the Environmental Statement Appendix 8.25, Annex 1 and 2 [APP-266].	
The viaduct is visually unappealing.	The viaduct has been sited in the optimum location to cross the valley to minimise environmental impacts; it is designed to retain the open character of the valley floor and minimise its visual impact in the landscape in which it would be located. As set out in the Environmental Statement Chapter 7, Landscape and Visual [APP-045], at Section 7.8, the Scheme includes sympathetic regrading of the earthworks, new planting around the viaduct abutments and new native hedgerow. This aids integration of the viaduct into the landscape and reduces visual intrusion, and is secured as part of the landscaping scheme to be implemented pursuant to paragraph 8 of Schedule 2 to the draft Development Consent Order [APP-020]. The Design and Access Statement [APP-295] explains, at Paragraphs 6.3.13 and 6.3.14, the factors that were taken into consideration in the development of the preliminary design of the viaduct. Its detailed design will be produced with reference to the principles contained within Highways England's guide 'The Road to Good Road Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf).	RR-2306
Can local residents be included in the design of the viaduct?	The DCO application includes information and drawings which provide an understanding of the appearance of the viaduct. In particular, the Design and Access Statement [APP-295] included in the DCO application outlines the design principles in more detail. Interested parties will have the opportunity to review and comment on this information as part of the DCO examination process. The detailed design will be carried out sensitively, following principles such as those contained in Highways England's guide 'The Road to Good Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf).	RR-0665
I'm pleased with the viaduct / support for the viaduct.	Thank you for your comment.	RR-1032, RR-2363
Move eastern end of the River Till viaduct south to reduce earthworks.	The position for the River Till viaduct has been carefully chosen to ensure it is in the optimal location. The Design and Access Statement [APP-295] explains, at Paragraphs 6.3.13 and 6.3.14 the factors that were taken into consideration in the development of the preliminary design of the viaduct, which reflects a carefully weighed balance of impacts on Winterbourne Stoke with minimising land take and avoiding or minimising impacts on the River Till SSSI/SAC and its flood zone. The position of the viaduct optimises the road alignment to cross the River Till at a right	RR-2108, RR-2354, RR-1606, RR-2345

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>angle, enabling shorter spans for the twin deck structure over a narrow section of the river. Moving the eastern end of the viaduct south would adversely affect the overall balance of impacts.</p>	
<p>Do not damage the environment or archaeology when constructing this viaduct.</p>	<p>The viaduct design has been chosen to carry the new road across the Till valley whilst retaining the open character of the valley floor and to minimise its visual impact in the landscape in which it sits. As set out in ES Chapter 7, Landscape and Visual [APP-045], Section 7.8, the Scheme includes sympathetic regrading of the earthworks, new planting around the viaduct abutments, and new native hedgerow, to aid integration of the viaduct into the landscape and reduce visual intrusion, secured as part of the landscaping scheme to be implemented pursuant to paragraph 8 of schedule 2 of the draft Development Consent Order [APP-020]. Further, as set out in ES Chapter 8, Biodiversity [APP-046], the viaduct has been located and designed to minimise the impacts on the River Till SSSI, in particular the height of the viaduct has taken into account minimisation of shading on the below River Till SSSI and the adjacent grassland habitat, part of the River Avon SAC. The Outline Environmental Management Plan [APP-187], reference D-BIO1, requires the River Till viaduct to comprise a twin deck viaduct structure with a minimum 7m open gap between the bridge and requires the bridge piers and foundations to fall outside the extents of the SAC or SSSI. Compliance with the Outline Environmental Management Plan is secured via requirement 4 in Schedule 2 to the draft DCO [APP-020].</p> <p>With regard to archaeology, the preferred route was carefully chosen to minimise effects on archaeology, and a comprehensive programme of archaeological evaluation surveys has informed the scheme being designed in a way that has limited any direct physical impacts on archaeology. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction. The principles of archaeological mitigation are outlined in Appendix 6.11 of the ES, Outline Archaeological Mitigation Strategy [APP-220], which has been informed by a comprehensive programme of archaeological evaluation. A Detailed Archaeology Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group and is secured by requirement 5 of Schedule 2 to the draft DCO [APP-020].</p> <p>During construction, potential impacts will be controlled and where necessary mitigated pursuant to the Outline Environmental Management Plan (OEMP) [APP-187] submitted with the DCO, as</p>	<p>RR-0665, RR-1615, RR-1978</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	set out in Table 3.2a: Register of Environmental Actions and Commitments (REAC) tables for the preliminary works, and Table 3.2b: REAC tables for the main works. The OEMP is secured through paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020].	
The viaduct will be completely out of place in this rural landscape and will have an adverse impact with or without the parapet.	The viaduct has been sited in the optimum location to cross the valley and minimise environmental impacts; it is designed to retain the open character of the valley floor and minimise its visual impact in the landscape in which it would be located. The Design and Access Statement [APP-295] explains, at Paragraphs 6.3.13 and 6.3.14, the factors that were taken into consideration in the development of the preliminary design of the viaduct. As set out in the Environmental Statement, Chapter 7, Landscape and Visual [APP-045], at Section 7.8, the scheme includes sympathetic regrading of the earthworks, new planting around the viaduct abutments, and new native hedgerow to aid integration of the viaduct into the landscape and reduce visual intrusion. This is secured as part of the landscaping scheme to be implemented pursuant to paragraph 8 of Schedule 2 to the draft Development Consent Order [APP-020]. The 1.5m parapet proposed in response to public engagement through statutory consultation on the scheme proposals will further mitigate the potential effects of the viaduct by screening traffic. The environmental screen is secured in the Outline Environmental Management Plan [APP187], reference D-LAN2, compliance with the OEMP is required by paragraph 4 of Schedule 2 to the draft DCO [APP-020]. The detailed design of the viaduct will, in due course, be developed with reference to the design principles contained within Highways England's guide 'The Road to Good Road Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf).	RR-2370
The viaduct should be as unobtrusive as possible, it should blend into the landscape.	The River Till viaduct has been sited in the optimum location to cross the valley and minimise environmental impacts; it has been designed to retain the open character of the valley floor and minimise its visual impact in the landscape in which it would be located. As set out in the Environmental Statement, Chapter 7, Landscape and Visual [APP-045], in section 7.8, the Scheme includes sympathetic regrading of the earthworks, new planting around the viaduct abutments, and new native hedgerow to aid integration of the viaduct into the landscape and reduce visual intrusion. This is secured as part of the landscaping scheme to be implemented pursuant to paragraph 8 of Schedule 2 to the draft Development Consent Order [APP-020]. Its detailed design will, in due course, be developed with reference to the design principles contained within Highways England's guide 'The Road to Good Road Design'	RR-0665, RR-2370

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf .	
The views of the residents of Winterbourne Stoke should prevail.	All views expressed in response to the consultation, including the views of Winterbourne Stoke residents, have been taken into consideration, as set out in the Consultation Report [APP-026]. Due to the materiality of the community of Winterbourne Stoke's interest in the Scheme, Highways England has undertaken to develop a Statement of Common Ground with the Parish Council. Through this mechanism, the two parties are engaged in detailed discussion about the development of the proposed Scheme.	RR-0665
The screen should be designed and/or constructed using materials that are sympathetic to the surrounding environment.	The detailed design of the viaduct, and screening to the southern perimeter, would be progressed at the detailed design stage following grant of consent for the scheme. The detailed design would be with reference to Highways England's guide 'The Road to Good Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf).	RR-2108, RR-2354, RR-1606, RR-2345
There should be a screen on the northern parapet too.	It is not proposed that a screen be provided on the north side of the viaduct. The need for screening is informed by both the landscape and visual impact assessment (LVIA) and the noise assessment. The assessments, which are reported in the Environmental Statement (ES) have concluded that environment screening on the south side of the viaduct will benefit the residents of Winterbourne Stoke in reducing the visual impacts of traffic, but there is not an equivalent need on the north side of the viaduct. Further details of the assessments can be found in ES Chapters 7, Landscape and Visual Assessment [APP-045], and Chapter 9, Noise and Vibration [APP-047].	RR-2108, RR-2354, RR-1606, RR-2345
Will trees be planted between the viaduct and Winterbourne Stoke?	The viaduct crossing of the River Till is designed to retain the open character of the valley floor and minimise its visual impact on the landscape within which it would be located. The embanked approaches will be landscaped and there will be planting either side of the viaduct. In addition, discussions are ongoing with landowners regarding potential offsite planting by agreement within the Till valley between the viaduct and Winterbourne Stoke. Landscape reprofiling areas are shown indicatively on the General Arrangement Drawings [APP-012]. The detail of proposed landscaping will be developed as part of the detailed design of the Scheme. Requirement 8 in Schedule 2 to the draft DCO [APP-020] requires before the commencement of any part of the Scheme, the written approval of the Secretary of State, in consultation with the local planning authority, of a landscaping scheme for that part of the Scheme, based on the mitigation	RR-2108, RR-2354, RR-1606, RR-2345

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	measures included in the Environmental Statement [principally APP-038-054, 059, 186 and 187].	
<p>The viaduct will be very harmful to the environment. Please do not proceed with it.</p>	<p>The River Till viaduct is a necessary part of the Scheme. It allows for a bypass of Winterbourne Stoke which, as well as allowing free-flowing traffic, will result in significant benefits for Winterbourne Stoke. The design has been chosen to carry the new road across the Till valley whilst retaining the open character of the valley floor and to minimise its visual impact in the landscape in which it would be located. The Design and Access Statement [APP-295] explains, at Paragraphs 6.3.13 and 6.3.14, the factors that were taken into consideration in the development of the preliminary design of the viaduct. As set out in the Environmental Statement, Chapter 7, Landscape and Visual [APP-045], in section 7.8, the Scheme includes sympathetic regrading of the earthworks, new planting around the viaduct abutments, and new native hedgerow, to aid integration of the viaduct into the landscape and reduce visual intrusion, as secured as part of the landscaping scheme to be implemented pursuant to paragraph 8 of Schedule 2 to the draft Development Consent Order [APP-020]. Further, as set out in ES Chapter 8, Biodiversity [APP-046], the viaduct has been located and designed to minimise the impacts on the River Till SSSI, in particular the height of the viaduct has taken into account minimisation of shading on the below River Till SSSI and the adjacent grassland habitat, part of the River Avon SAC.</p> <p>During construction, potential impacts will be controlled and where necessary mitigated through the implementation of a Construction Environmental Management Plan, which will be based on the Outline Environmental Management Plan (OEMP) [APP-187] submitted with the DCO application, as set out in Table 3.2a: Register of Environmental Actions and Commitments (REAC) tables for the preliminary works, and Table 3.2b: REAC tables for the main works. The OEMP is secured through paragraph 4 of schedule 2 to the draft Development Consent Order [APP-020].</p>	RR-1008
<p>Winterbourne Stoke should receive as much protection as possible from traffic noise.</p>	<p>The viaduct will have environmental screening on its south side to reduce the visual impacts of traffic in views from Winterbourne Stoke. The noise assessment carried out for the Scheme indicates that only one property to the north of Winterbourne Stoke, Foredown House, will experience increased traffic noise, but 50 other residential buildings located along and close to the existing A303 will all experience moderate or major reductions in traffic noise levels. Full details of the predicted noise levels in the village can be found in the Environmental Statement, Chapter 9, Noise and Vibration [APP-047], Section 9.9. The environmental screen is secured in</p>	RR-1008, RR-2343, RR-1954

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	the Outline Environmental Management Plan [APP187], reference D-LAN2, compliance with the OEMP is required by paragraph 4 of Schedule 2 to the draft DCO [APP-020].	
There is no need to plant a hedge alongside the Byway underneath the viaduct. It would be unjust for Manor Farm to have to meet these costs.	The Scheme design adopts a landscape scale approach to ecological connectivity and enhancement. This approach includes the retention, replacement, and planting of new hedgerow, as well as grassland, shrub, and woodland habitat, to improve ecological connectivity throughout the scheme area and to integrate the Scheme into the surrounding landscape. The new hedgerow in this location allows for the continuity of hedgerow along Byway WST04, contributing to the landscape scale approach to ecological connectivity and enhancement. The detail of proposed landscaping will be developed as part of the detailed design of the Scheme. Requirement 8 in Schedule 2 to the Draft DCO [APP-020] requires, before the commencement of any part of the Scheme, the written approval of the Secretary of State, in consultation with the local planning authority, of a landscaping scheme for that part of the Scheme. The hedgerows required for environmental mitigation purposes will be subject to rights acquisition within the DCO. If an agreement for maintenance cannot be made with the landowner, then Highways England will arrange maintenance with a subcontractor.	RR-2108, RR-2354, RR-1606, RR-2345
The issues of dust, noise, vibration and light pollution have been insufficiently risk-assessed.	The potential for impacts relating to dust, noise, vibration and light at the River Till viaduct have been considered through the environmental impact assessment process and the results of the assessments are presented in the respective Environmental Statement (ES) topic chapters: Chapter 5, Air Quality [APP-043]; Chapter 7, Landscape and Visual Impact Assessment [APP-045]; and Chapter 9, Noise and Vibration, [APP-047]. The assessments were carried out in accordance with the relevant assessment guidance and best practice, as set out in the legislative and policy framework sections of each ES chapter. Construction impacts relating to dust, noise and vibration, and intrusive lighting will be mitigated through implementation of the measures set out in the Outline Environmental Management Plan (OEMP) [APP-187] submitted with and secured by paragraph 4 in Schedule 2 to the draft Development Consent Order [APP-020]. Operational noise impacts will be reduced through the use of a thin road surfacing system which results in lower levels of noise generation. Light pollution impacts will be reduced through the provision of an environmental screen on the south side of the viaduct, which will screen views of car headlights from Winterbourne Stoke. The environmental screen is secured in the Outline Environmental Management Plan [APP187], reference D-LAN2, compliance with the OEMP is required by paragraph 4 of Schedule 2 to the draft DCO [APP-020].	RR-0184, RR-0346, RR-0883, RR-1731, RR-2108, RR-2354, RR-1606, RR-2345

6 Noise and Vibration and Air Quality, Dust and Other Emissions

6.1 Overview

- 6.1.1 A total of 392 interested parties raised matters regarding noise, vibration, air quality, dust and other emissions in relation to the scheme in their relevant representations.
- 6.1.2 Table 6-1 below provides a summary of the key issues raised in relation to noise, vibration, air quality, dust and other emissions, alongside a response from Highways England.

Table 6-1: Noise and Vibration and Air Quality, Dust and Other Emissions

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
There needs to be a quiet road surface throughout the Scheme.	A thin surfacing system (which generates less noise than a standard hot rolled asphalt surface) will be used on the new A303 dual carriageway and slip roads. This is detailed in the Outline Environmental Management Plan (OEMP), presented in Appendix 2.1 of the ES (OEMP) [APP-187]), secured under Requirement 4 of Schedule 2 within the DCO. In accordance with the standard UK assessment methodology, such surfaces typically provide a 3 dB reduction in traffic noise at speeds of 75km/hr or more.	RR-2108, RR-2354, RR-1606, RR-2345
There was no quantitative information on noise on which to judge likely impacts.	The statutory consultation presented preliminary environmental information. Since then, a comprehensive programme of quantitative noise modelling has been undertaken to inform the noise assessment, as reported in ES Chapter 9, Noise and Vibration [APP-047], Section 9.9.	RR-0098, RR-0562
Concerned that the increase in traffic volumes will lead to increased road traffic noise levels and impacts on local residents. How will this be mitigated?	The noise assessment for the Scheme is set out in ES Chapter 9, Noise and Vibration [APP-047]. The assessment includes consideration of changes in traffic volumes due to the Scheme. The Scheme's mitigation measures include the use of a thin surfacing system (which generates less noise than a standard hot rolled asphalt surface), provision of noise barriers on the Countess flyover and environmental screening past Winterbourne Stoke. Using predictive traffic modelling, and with the above mitigation in place, the assessment indicates that significant permanent adverse noise effects would occur at one property to the north of Winterbourne Stoke and at properties along Church Street and High Street, Amesbury, as set out in Section 9.9 and summarised in Table 9.24. The assessment has also concluded that there would be significant permanent beneficial noise effects for residents of Winterbourne Stoke located along and close	RR-0412, RR-0870, RR-1834, RR-1661

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	to the existing A303, residents of Stonehenge Cottages, and residential buildings on the B390 between Chitterne and Shrewton (Section 9.9 and summarised in Table 9.24). All other operational noise effects would be not significant.	
Concerns about the noise and air pollution coming from the tunnel portals	In terms of air quality, while there will be higher levels of pollutants at the tunnel portals, they will disperse quickly, creating no significant adverse effects on air quality, as set out in ES Chapter 5 [APP-043], paragraph 5.9.45 – 5.9.51. In terms of noise, potential impacts will be reduced by the cuttings in which the road will sit at the portals and the use of an absorbent lining inside the ends of the tunnel, resulting in beneficial noise effects within the majority of the WHS, as set out in ES Chapter 9, Noise and Vibration [APP-047], Section 9, and illustrated on Figure 9.4 [APP-167] and 9.5 [APP-168].	RR-0093, RR-1321, RR-1491, RR-1610, RR-1861
Concerned over emissions inside the tunnel and health impact on other users.	There are no significant air quality effects associated with the Scheme, including tunnel portal emissions, as set out in ES Chapter 5, Air Quality [APP-043], paragraphs 5.9.92 – 5.9.94. A tunnel ventilation strategy will be developed for the Scheme to ensure adequate control of emissions in the tunnel (as secured by item MW-AIR3 of the OEMP). The OEMP is secured under paragraph 4 of schedule 2 within the draft Development Consent Order [APP-020]. The Human Health assessment, set out in ES Chapter 13, People and Communities [APP-051], Section 13.9, does not identify any detrimental impact on human health as a result of the operation of the Scheme, instead concluding that the operation of the Scheme would result in positive impacts on the health of residents in the study area.	RR-1834, RR-1722
Noise and air quality at the tunnel portals will be particularly bad. How will this be managed?	In terms of air quality, while there will be higher levels of pollutants at the tunnel portals they will disperse quickly, creating no significant adverse effects on air quality, as set out in ES Chapter 5, Air Quality [APP-043], paragraph 5.9.45 – 5.9.51. In terms of noise, potential impacts will be reduced by the cuttings in which the road will sit at the portals and the use of an absorbent lining inside the ends of the tunnel, resulting in beneficial noise effects within the majority of the WHS, as set out in ES Chapter 9, Noise and Vibration [APP-047], Section 9, and illustrated on Figure 9.4 [APP-167] and 9.5 [APP-168].	RR-1482, RR-1782
We have not yet been provided with detail on the potential noise impacts of the areas marked as 'contractor site compounds' during	Details of the construction compounds are provided in ES Chapter 2 [APP-039]. ES Chapter 9, Noise and Vibration [APP-047], sets out the assessment of potential construction noise impacts, including from proposed construction compounds and associated activities. As summarised in table 9.25, 'Summary of significant effects – construction', the noise assessment identifies temporary significant noise effects at receptors close to Countess Roundabout and one receptor north of Winterbourne Stoke, as a result of the construction of the Countess bridge and flyover	RR-0858

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
construction.	and the River Till viaduct bridge and deck, respectively. Activities from construction compounds themselves would not result in significant adverse noise effects. The potential impacts would be mitigated through the implementation of the Outline Environmental Management Plan (OEMP) [APP-187], including, in relation to noise, PW-NOI1, PW-NOI3, PW-NOI5, MW-NOI1, MW-NOI3, MW-NOI4, and MW-NOI6. The OEMP is secured under paragraph 4 of schedule 2 within the draft Development Consent Order [APP-020].	
A requirement that a CEMP is to be submitted to and agreed by the Local Authority prior to the commencement of the construction phase to identify measures to mitigate noise, vibration and dust from the construction phase of the scheme, including the siting, construction and operation of construction compounds and satellite offices, and use of low noise / low vibration methods. Specific emphasis is to be made to mitigating noise from construction of the elevated sections of the road at Countess Roundabout and over the River Till north of Winterbourne Stoke, and vibration at Stonehenge Cottages from the tunnel boring operations.	As part of the EIA process, an Outline Environmental Management Plan (OEMP) [APP-187] has been prepared that sets out general and topic-specific principles and requirements for the control, mitigation and monitoring of potential construction impacts, including stipulating the use of low noise and low vibration construction methods and dust management and suppression techniques for minimising impacts on receptors. This includes receptors in the vicinity of works for the Countess flyover, Till viaduct and tunnel boring, including but not limited to, Countess Farm, Travelodge, Stonehenge Cottages, and Foredown House(see PW-NOI1, PW-NOI3, PW-NOI4, PW-NOI5, MW-NOI1, MW-NOI3, MW-NOI4, MW-NOI5, and MW-NOI6, and PW-AIR1, MW-AIR1, and MW-AIR4 in the OEMP). Highways England's appointed contractor will be required to develop, in consultation with Wiltshire Council, and implement a detailed Construction Environmental Management Plan (CEMP) based on, and incorporating the relevant requirements of, the OEMP. The OEMP's control, mitigation and monitoring requirements (including in relation to the use/operation of construction compounds) have underpinned the assessments of effects for all environmental topics presented in the Environmental Statement. The OEMP will be secured under paragraph 4 of schedule 2 of the draft Development Consent Order [APP-020].	RR-0858
Increased noise and air pollution from faster traffic	<p>Noise</p> <p>The noise assessment for the Scheme is set out in ES Chapter 9, Noise and Vibration [APP-047]. The assessment is based on traffic data with and without the Scheme in place and includes</p>	For a list of RR that raised this issue, please refer to

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>changes in traffic speeds due to the Scheme. The assessment indicates that, for residential receptors, there would be significant permanent beneficial traffic noise effects for residents of Winterbourne Stoke located along and close to the existing A303, residents of Stonehenge Cottages, and residential buildings on the B390 between Chitterne and Shrewton. There would be significant permanent adverse noise effects at one property to the north of Winterbourne Stoke and at properties along Church Street and High Street, Amesbury. In addition, the Scheme would significantly reduce the level of traffic noise in much of the WHS, resulting in a beneficial effect on the surroundings, context and ambience of the landscape, as concluded in the Heritage Impact Assessment [APP-195], Section 9. All other operational noise effects would be not significant.</p> <p>Air Quality</p> <p>Locally, air quality will improve in Winterbourne Stoke, in the WHS along the tunnelled section of the Scheme and through nearby communities, where traffic levels will reduce because drivers will no longer divert to avoid congestion on the A303. Further afield, where traffic flows are forecast to increase, air quality will deteriorate, albeit not to result in poor air quality. This is because only small deteriorations are expected, and the existing air quality is well within the Government's national air quality objectives. Further information can be found in ES Chapter 5, Air Quality [APP-043].</p>	Appendix E.

7 Biodiversity, Biological Environment and Ecology

7.1 Overview

- 7.1.1 A total of 651 interested parties raised matters concerning the biodiversity, biological environment and ecology within the area of the proposed scheme in their relevant representations.
- 7.1.2 Table 7-1 provides a summary of the key issues raised in relation to biodiversity, biological environment and ecology, alongside a response from Highways England.

Table 7-1: Biodiversity, Biological Environment and Ecology

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Have you assessed construction impacts on ecology and how will these be mitigated?	Potential construction impacts on ecology have been assessed using the methodology for ecological impact assessment presented in section 8.3 of ES Chapter 8, Biodiversity [APP-046]. Impacts assessed include habitat loss or gain; fragmentation of populations or habitats; disturbance; habitat degradation; and specific mortality. Such impacts have first been avoided or reduced through the Scheme's design development and refinement, as discussed in ES Chapter 3, Assessment of Alternatives [APP-041]. They will be further mitigated pursuant to measures in the Outline Environment Management Plan (OEMP) [APP-187] which will contain safeguarding measures to protect watercourses, flora and fauna. The OEMP will be secured under Requirement 4 of Schedule 2 within the DCO [APP-020].	RR-0033, RR-1834, RR-2274
All possible attempts should be made to preserve and enhance ecological receptors, including habitat and species, across the site.	The Scheme's objectives include the aim of improving biodiversity along the route. This is being achieved in a number of ways, including; downgrading the redundant length of the A303 to a restricted byway, helping to connect habitats within much of the WHS, and extending the chalk grassland adjacent to the Parsonage Down NNR. Full details of the biodiversity gains can be found in the ES Chapter 8 [APP-046], Sections 8, 8.8.14 – 8.8.21, 8.9.65 – 8.9.66, and Table 8.14, <i>Habitat losses and gains associated with the Scheme</i> .	RR-0309, RR-0041, RR-0594, RR-0593, RR-0361, RR-0854, RR-1357, RR-1146, RR-1407, RR-1408, RR-0940, RR-0955, RR-0971, RR-1000, RR-1130, RR-1535, RR-1636, RR-1869, RR-1930, RR-2339, RR-1925

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>Adverse impacts on ecology, including protected species.</p>	<p>The ecological impact assessment, as presented in ES Chapter 8 [APP-046], has considered the potential of the Scheme to have adverse impacts on all aspects of biodiversity, including protected species. The potential for significant effects on features of European protected sites has been fully addressed in the Habitats Regulations Assessment (HRA), Appendices 8.24 [APP-265] and 8.25 [APP-266].</p> <p>It is considered that the only significant biodiversity adverse effect would be the permanent loss of the Countess Cutting CWS, however the loss would be mitigated over time by the creation of chalk grassland in the new cutting between the eastern portal and Countess Junction. Full details of the biodiversity gains can be found in the ES Chapter 8 [APP-046], Section 8, 8.8.14 – 8.8.21, 8.9.65 – 8.9.66, and Table 8.14, <i>Habitat losses and gains associated with the Scheme</i>. With application of the measures set out in the Outline Environmental Management Plan (OEMP) [APP-187], and environmental mitigation measures, as described in Section 8.8 of the ES Chapter 8 and Appendix 2.1 of the ES [APP-186] (which will be implemented as part of the landscaping scheme required pursuant to requirement 8 of Schedule 2 of the DCO [APP-020]), no further significant effects are anticipated. A summary of non-significant effects is provided in Appendix 8.23 [APP-264].</p>	<p>For a list of RR that raised this issue, please refer to Appendix 05.</p>
<p>Increased access into and through the WHS will lead to disturbance of wildlife.</p>	<p>The ecological impact assessment, as presented in ES Chapter 8, Biodiversity [APP-046], has considered the potential for disturbance to wildlife in the WHS, as described in ES Section 8.7. This includes in relation to stone curlew, which are particularly vulnerable to human disturbance when nesting (8.9.16 – 8.9.187 and ES Appendix 8.25, Section 5). While visitor access may increase, public access to the south of the A303 will be restricted to public rights of way, as at present. The assessment indicates that the increased access through the WHS will not lead to an adverse effect on wildlife in the WHS, as set out in Section 8.9, Assessment of Effects.</p>	<p>RR-0529, RR-0525, RR-0538, RR-0635, RR-0637, RR-1482, RR-2262, RR-2306</p>
<p>There is not enough information on the proposals to create chalk grassland habitat at the Parsonage Down site. How do you propose to achieve this?</p>	<p>The full extent of proposed new chalk grassland habitat on land east of Parsonage Down is shown indicatively in the proposed Environmental Masterplan, Figure 2.5 of the Environmental Statement, [APP-059]. Environmental Statement Chapter 2, The Proposed Scheme [APP-040], outlines the proposals for the treatment, 2.4.52 – 2.4.53, transportation, 2.4.19, and use, 2.4.54 – 2.4.55, of excavated material. Chemical testing and assessment of the physical characteristics of the chalk samples obtained from the ground investigation surveys undertaken indicates that, with treatment to reduce water content, which will take place at the Slurry Treatment Plant, the material will be suitable for use in creating the chalk grassland. The excavated chalk will be</p>	<p>RR-1003</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>checked and treated to ensure its suitability for use.</p> <p>These principles are set out in the Outline Landscape and Ecology Management Plan ('OLEMP') [APP-267]. Under requirement 8 of Schedule 2 of the DCO, Highways England will be required to submit a detailed landscaping scheme, which is required to be on the basis of the mitigation measures set out in the ES, which includes the OLEMP.</p>	
<p>Adverse impacts on European protected sites, including Salisbury Plain SPA, Salisbury Plain SAC (including Parsonage Down NNR), and River Till SAC (including River Till SSSI).</p>	<p>The potential for the Scheme to affect European protected sites has been fully assessed, as reported in ES Chapter 8, Biodiversity [APP-046], section 8.9, and, in greater detail, in the Habitats Regulations Assessment (HRA), Appendices 8.24 [APP-265] and 8.25 [APP-266]. The assessment has concluded that there will be no adverse effects on the integrity of the European protected sites.</p>	<p>RR-0183</p>
<p>Adverse impact on Parsonage Down National Nature Reserve and Site of Special Scientific Interest.</p>	<p>The potential impact of the Scheme on Parsonage Down SSSI and NNR is set out in ES Chapter 8, Biodiversity [APP-046], section 8.9. As discussed in paragraphs 8.9.45 – 8.9.49, there would be no loss of habitat within Parsonage Down SSSI due to the construction of the Scheme. There would be modification of existing calcareous grassland on 1.2ha of the 188ha Parsonage Down SSSI to provide a stone curlew nesting plot. This will have a local level/ slight beneficial effect within the SSSI.</p> <p>As discussed in paragraphs 8.9.54 – 8.9.56 in APP-046, Parsonage Down NNR is partially located within the Scheme boundary, it is an area of intensively managed farmland which supports grazing management within the SSSI. The agriculturally-improved land that would be lost would be replaced with chalk grassland and associated habitats, which would result in a permanent a local level/ slight beneficial effect on Parsonage Down NNR.</p>	<p>RR-1918</p>
<p>The proposed Scheme will have permanent adverse impacts on bat roosting and flight pathways from lighting, noise, pollution and vibration.</p>	<p>The potential impact of the Scheme on bats, bat roosts and bat flight paths, including from lighting, noise, air quality (pollution) and vibration is assessed in ES Chapter 8, Biodiversity [APP-046], Section 8.9 The Scheme avoids direct impacts on known bat roosts. A variety of mitigation measures form part of the Scheme proposals, including:</p> <ul style="list-style-type: none"> mitigation and control measures included in the Outline Environmental Management Plan 	<p>RR-1145</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>(OEMP) (specifically in relation to bats: PW-BIO7 and MW-BIO10; in relation to lighting: MW-G29 and MW-BIO4; in relation to noise and vibration: PW-NOI1, PW-NOI3, PW-NOI5, MW-NOI1, MW-NOI3 and MW-NOI6); and, in relation to air quality (pollution): PW-AIR1, MW-AIR1, and MW-AIR4). The OEMP is presented as ES Appendix 2.2 [APP-187], which is secured through paragraph 4 of schedule 2 of the draft DCO [APP-020],</p> <ul style="list-style-type: none"> • new bat hibernacula to enhance opportunities for bats (details of which will be provided in the Landscape and Ecology Management Plan (LEMP), which is a requirement of the OEMP); • green bridges; • false cuttings; and • the sensitive design of the River Till viaduct (D-BIO1 in the OEMP, [APP-020]). <p>Additionally, the Scheme is pursuing a landscape scale approach to mitigation and connectivity which will see the creation of a linked mosaic of high-quality habitat of potential value for foraging. The principles of this mitigation are set out in the Outline Landscape and Ecology Management Plan ('OLEMP') [APP-267]. Under requirement 8 of Schedule 2 of the DCO [APP-020], Highways England will be required to submit a detailed landscaping scheme, which is required to be on the basis of the mitigation measures set out in the ES, which includes the OLEMP.</p> <p>Overall the assessment concludes there will be no significant effects on bats, and, at year 15 of operation, a slight beneficial effect would be recognised at a local level due to the maturation of new habitat (8.9.156).</p>	
<p>The scheme will result in the permanent loss of habitat.</p>	<p>While the Scheme would result in the loss of arable land, it would secure a net-gain of the key chalk grassland habitat, delivering a permanent beneficial effect. Full details of the biodiversity gains can be found in the ES Chapter 8 [APP-046], Section 8, 8.8.14 – 8.8.21, 8.9.65 – 8.9.66, and Table 8.14, <i>Habitat losses and gains associated with the Scheme</i>.</p>	<p>RR-0079, RR-0251, RR-0249, RR-0093, RR-0500, RR-0399, RR-1341, RR-1339, RR-0678, RR-1610, RR-0981, RR-1596, RR-1731, RR-1843, RR-1703, RR-1671, RR-1895, RR-1816,</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
		RR-2269, RR-2214, RR-2199
Does the scheme include animal tunnels, to increase connectivity through the scheme?	As described in ES Chapter 8, Biodiversity [APP-046], section 8.8, in addition to the four green bridges, which each provide wildlife crossings, the Scheme incorporates a number of mammal tunnels. The locations of the proposed green bridges and mammal tunnels are shown indicatively on the environmental masterplan, ES Figure 2.5 [APP-059], and detail would be included as part of the Landscape and Ecology Management Plan, which is required to be prepared pursuant to the Outline Environmental Management Plan ("OEMP") [APP-187], at reference MW-LAN1. Compliance with the OEMP is secured through paragraph 4 of Schedule 2 of the DCO [APP-020].	RR-2150
How will the scheme ensure that the Water Voles in the River Till SSSI are protected?	The ecological impact assessment, reported in ES Chapter 8 [APP-046], Biodiversity, considers the potential for impacts on water voles. As set out in paragraphs 8.9.161 – 8.9.162, due to the distance of the Scheme from suitable water vole habitat (over 500m), construction activities within the River Till valley would not disturb water vole present within the downstream reaches. As such, the effects are neutral and not significant. As set out in paragraph 8.9.230, no direct or indirect impacts are anticipated on water voles from the operational phase of the Scheme.	RR-1032, RR-2363
Concerned about the ecology of the River Till SSSI, how will this be protected?	The ecological impact assessment is reported in ES Chapter 8, Biodiversity [APP-046]. With the mitigation embedded in the Scheme's design, including the twin-deck design of the viaduct spanning the river at a sufficient height to avoid shading impacts, there will be no likely significant adverse effects on ecology of the River Till SSSI. Protection during construction will be afforded by measures contained in the Outline Environmental Management Plan (OEMP) to, for example, control dust (PW-AIR1 and MW-AIR1), contain spillages (PW-WAT1, MW-WAT4, MW-WAT5, MW-WAT7, and MW-WAT15) and protect vegetation within the SSSI from direct impact (D-BIO1). The Scheme is required to be carried out in accordance with the requirements of the OEMP [APP-187] pursuant to paragraph 4 of Schedule 2 of the DCO [APP-020]. Full details of the assessment in relation to the River Till SSSI are set out in ES Section 8.9.8 – 8.9.19 and, in the context of the whole River Avon SAC, which includes the River Till SSSI, in ES Appendix 8.25, Habitats Regulations Assessment (HRA): Statement to Inform Appropriate Assessment [APP-266], Section A.3.	RR-0033, RR-0183, RR-1727
How will you ensure that trout and salmon are protected during construction, including	During construction, the Rivers Till and Avon will be protected by mitigation measures contained within the Outline Environmental Management Plan (OEMP) [APP-187], to avoid, for example, spillages discharging to ground and polluting the rivers (PW-WAT1, MW-WAT4, MW-WAT5,	RR-2308

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>from poaching by the work force?</p>	<p>MW-WAT7, and MW-WAT15). Other measures include programming construction of the River Till viaduct so as much work as possible is done while the river is seasonally dry (MW-G9 and MW-BIO3). The Scheme is required to be carried out in accordance with the requirements of the OEMP pursuant to paragraph 4 of Schedule 2 of the DCO [APP-020].</p> <p>Further information can be found in ES Chapter 8, Biodiversity [APP-046]. The overall conclusion is that fish species within the study area will experience no adverse effects, as set out in 8.9.95 – 8.9.102. Regarding poaching, the appointed contractor will be responsible for the conduct of its workforce, who will be subject to UK angling and poaching law.</p>	
<p>How will you be protecting RSPB reserves?</p>	<p>One RSPB reserve falls within the study area for the Scheme, Normanton Down, and this would not be directly affected. The ecological impact assessment, reported in ES Chapter 8, Biodiversity [APP-046], has concluded that no likely significant effects would result on breeding birds, as set out in paragraph 8.9.35. The assessment and approach to mitigation and enhancement for stone curlew has been developed in consultation with the RSPB and Natural England. Provision of an additional stone curlew plot has been agreed with RSPB at Winterbourne Down to improve resilience of the stone curlew population in the area.</p>	<p>RR-0549, RR-1918, RR-2288, RR-2303, RR-2134, RR-2201, RR-2088, RR-2220</p>
<p>Bird populations are more affected by roads than most wildlife. How have these been considered in your assessment?</p>	<p>The ecological impact assessment, reported in ES Chapter 8, Biodiversity [APP-046], paragraphs 8.9.211 – 8.9.214, considers the potential for impacts on bird populations, both breeding and wintering, as a result of habitat loss, direct mortality, habitat degradation, and habitat fragmentation. Due to the limited size of the areas to be affected and the ample suitable alternative habitat present in the local area, it is considered likely that the loss of breeding habitat would not result in an adverse effect and would be considered as neutral and not significant. In addition, mitigation measures have been included in the design in the form of false cuttings and planting, to minimise the potential for bird mortality due to vehicle strike. Further, the Scheme proposals include the creation of extensive areas of new chalk grassland, woodland, and scrub, which have the potential to provide nesting and foraging opportunities in the future. The principles of this mitigation are set out in the Outline Landscape and Ecology Management Plan ('OLEMP') [APP-267].</p> <p>Under requirement 8 of Schedule 2 of the DCO [APP-020], Highways England will be required to submit a detailed landscaping scheme, which is required to be on the basis of the mitigation measures set out in the ES, which includes the OLEMP. In addition to mitigation, full details of</p>	<p>RR-0838, RR-1731</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	the biodiversity gains can be found in the ES Chapter 8 [APP-046], Section 8, 8.8.14 – 8.8.21, 8.9.65 – 8.9.66, and Table 8.14, <i>Habitat losses and gains associated with the Scheme</i> .	
Concerned about the lack of reference to butterflies and their conservation in the EIA. How will butterflies be protected and their habitat enhanced?	<p>The ecological impact assessment, reported in ES Chapter 8, Biodiversity [APP-046], considers the potential for impacts on invertebrates, including butterflies, as a result of habitat loss and/or gain, habitat degradation, or habitat fragmentation. No adverse effects are expected. It is anticipated that habitats created within the Scheme (including new chalk grassland, the existing A303 through the WHS being turned into a new 'green' byway and the green bridges) will re-connect semi-natural habitats within the wider landscape, facilitating the spread of butterflies.</p> <p>The creation of inter-linked chalk grassland habitats would provide opportunities for colonisation and spread of butterflies and other invertebrates from Parsonage Down SSSI to other areas, which would be a beneficial effect, as it would contribute to the linking ecological networks, as concluded in section 8.9.94 of ES Chapter 8. The principles of this mitigation are set out in the Outline Landscape and Ecology Management Plan ('OLEMP') [APP-267]. Under requirement 8 of Schedule 2 of the DCO [APP-020], Highways England will be required to submit a detailed landscaping scheme, which is required to be on the basis of the mitigation measures set out in the ES, which includes the OLEMP.</p>	RR-1003
The proposed Scheme will have permanent adverse impacts on barn owls. How will they be protected?	The potential impact of the Scheme on barn owls is assessed as reported in ES Chapter 8, Biodiversity [APP-046], Section 8.9.130 – 8.9.137. During construction, the assessment recognises that overnight working may disturb foraging barn owls and that temporary increased noise impacts associated with overnight works may reduce their foraging success. Working practices will be adopted to limit the amount of disturbance and to restrict the amount of night time working in sensitive areas, as set out in the Outline Environmental Management Plan (OEMP) [APP-187] (for example in relation to lighting, MW-G29, and dust, MW-AIR2), which is secured through paragraph 4 of schedule 2 of the draft Development Consent Order [APP-020]. In operation, placing the A303 in a 2-mile long tunnel will remove a section of road that currently presents a risk of direct mortality. This would result in an effect that is beneficial at the local level, as set out in paragraphs 8.9.215 – 8.9.220	RR-1145
The Scheme does not meet the key objective to "improve biodiversity..."	The Scheme's objective of improving biodiversity is being achieved in a number of ways, including: placing the A303 in a 2-mile long tunnel in the WHS and therefore connecting habitats within much of the WHS; extending the chalk grassland adjacent to the Parsonage Down NNR; providing four green bridges; and delivering a mosaic of high-quality habitat through the	RR-0025, RR-0434, RR-0675, RR-0808, RR-1022, RR-1621,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>landscape scale approach to ecological mitigation. The principles of this mitigation are set out in the Outline Landscape and Ecology Management Plan ('OLEMP') [APP-267]. Under requirement 8 of Schedule 2 of the DCO [APP-020], Highways England will be required to submit a detailed landscaping scheme, which is required to be on the basis of the mitigation measures set out in the ES, which includes the OLEMP. The ecological impact assessment, reported in ES Chapter 8, Biodiversity [APP-046], has concluded that the net gain of chalk grassland, an ecologically valuable habitat type, and the provision of greater ecological connectivity would result in a significant beneficial effect for biodiversity. Full details of the biodiversity gains can be found in the ES Chapter 8 [APP-046], Section 8, 8.8.14 – 8.8.21, 8.9.65 – 8.9.66, and Table 8.14, <i>Habitat losses and gains associated with the Scheme</i>.</p>	RR-1731, RR-1683
<p>Why is the biodiversity of RSPB Normanton Down not being offered any enhancement or even protection for its tranquil wildlife refuge?</p>	<p>It is assumed that this relevant representation is primarily concerned with the stone curlew and other breeding birds at the RSPB reserve at Normanton Down. The RSPB reserve at Normanton Down would not be directly affected by the Scheme. The approach to Biodiversity and the mitigation of potential impacts on or enhancement of habitat for stone curlew has been considered at a Scheme-wide level. As set out in ES Chapter 8, Biodiversity [APP-046], the Scheme would not result in any likely significant effects on stone curlew or other breeding birds at RSPB Normanton Down, as set out in paragraph 8.9.35. The assessment and approach to mitigation and enhancement for stone curlew has been developed in consultation with the RSPB and Natural England. Provision of an additional stone curlew plot has been agreed with RSPB at Winterbourne Down to improve resilience of the stone curlew population in the area.</p>	RR-2288
<p>Chalk grassland requires management including livestock grazing to encourage optimum establishment. Looking at the proposed Scheme with chalk grassland indicated I struggle to see how this will be possible as the areas need to be accessed either by farm machinery or livestock.</p>	<p>The principles of creation and management of this land are set out in the Outline Landscape and Ecology Management Plan ('OLEMP') [APP-267]. Under requirement 8 of the DCO, Highways England will be required to submit a detailed landscaping scheme, which is required to be on the basis of the mitigation measures set out in the ES, which includes the OLEMP.</p> <p>In the areas where chalk grassland is to be managed by grazing, appropriate access for stock, fencing and stock watering facilities would be provided, as described in ES Chapter 8, Biodiversity [APP-046], 8.9.71.</p>	RR-2025

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>We are supportive of the proposed 'chalk grassland' but advise that careful consideration is given to what is created and how it is established and managed. Long-term consideration should be given to how areas should be managed by grazing (not mechanical means). Consideration should also be given to the source of local provenance seed/plant material This support is conditional on confirmation that the material is suitable for the purposes of creating chalk habitats.</p>	<p>Chemical testing and assessment of the chalk samples obtained from the ground investigation surveys undertaken indicates that, with treatment to reduce water content, which will take place at the Slurry Treatment Plant, the material will be suitable for use in creating the chalk grassland. The principles of creation and management of this land are set out in the Outline Landscape and Ecology Management Plan ('OLEMP') [APP-267]. Under requirement 8 of the DCO, Highways England will be required to submit a detailed landscaping scheme, which is required to be on the basis of the mitigation measures set out in the ES, which includes the OLEMP. Landscape and visual mitigation, as set out in ES Chapter 7, Landscape and Visual [APP-045], Section 8, would be based upon local landscape character. These design principles are secured through paragraph 8 of schedule 2 of the draft DCO [APP-020].</p>	<p>RR-1003</p>
<p>We are concerned for the River Avon SAC, comprising the River Till SSSI and River Avon System SSSI, in particular potential phosphorus pollution of ground and river water associated with the disturbance of nodules of phosphatic chalk during construction. This will be relevant to any habitat regulations assessment.</p>	<p>The potential for the Scheme to affect European protected sites, including the River Avon SAC, has been assessed, as reported in ES Chapter 8, Biodiversity [APP-046], and, with regards to the habitats regulations assessment (HRA), ES Appendix 8.24 [APP-265] and 8.25 [APP-266]. The assessment has concluded that, with the implementation of the environmental mitigation measures, as described in Section 8.8 of the ES Chapter 8 and Appendix 2.1 of the ES [APP-186] (which will be implemented as part of the landscaping scheme required pursuant to requirement 8 of Schedule 2 of the DCO [APP-020]) and those in the Outline Environmental Management Plan [APP-187] (MW-WAT1, WAT2, WAT6, WAT7, and WAT15), as secured through paragraph 4 of schedule 2 of the draft Development Consent Order, there will be no adverse effects on the integrity of the River Avon SAC.</p> <p>Phosphatic chalk has not been included within the HRA Likely Significant Effects report [APP-265] because chemical testing and assessment of the solubility and leachate potential of the phosphatic chalk show that the material does not pose a risk to controlled waters. The</p>	<p>RR-1621, RR-1683, RR-2366, RR-1954</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	phosphorus levels in the River Avon SAC would not be affected. Further information on the phosphatic chalk can be found in the ES Chapter 10, Geology and Soils [APP-048], Section 10.6, paragraphs 10.6.75 – 10.6.79.	
We are concerned for the River Avon SAC, comprising the River Till SSSI and River Avon System SSSI, in particular changes to hydrology pre and post construction, disturbance from drilling causing chalk or other sediment to occur in solution in the river, and dust and/or run-off during construction and road drainage and runoff during operation. This will be relevant to any habitat regulations assessment.	The potential for the Scheme to affect European protected sites, including the potential for impacts on River Avon SAC, has been fully assessed, as reported in ES Chapter 8, Biodiversity [APP-046], and, with regards to the habitats regulations assessment (HRA), ES Appendix 8.24 [APP-265] and 8.25 [APP-266]. The assessment has concluded that, with the implementation of the environmental mitigation measures, as described in Section 8.8 of the ES Chapter 8 and Appendix 2.1 of the ES [APP-186] (which will be implemented as part of the landscaping scheme required pursuant to requirement 8 of Schedule 2 of the DCO [APP-020]) and those included within the Outline Environmental Management Plan [APP-187] (PW-WAT1 and WAT2, and MW-WAT1, WAT2, WAT3, WAT4, WAT5, WAT6, WAT7, WAT9, WAT10, WAT14, and WAT15), as secured through paragraph 4 of schedule 2 of the draft Development Consent Order [APP-020], there will be no adverse effects on the integrity of the River Avon SAC. This is supported by the water assessment, as set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], which concluded that there would be no significant changes to hydrology, or to surface water quality or groundwater quality arising from sedimentation, dust or run-off during either the construction or operational phases of the Scheme. Instead there is likely to be a moderately beneficial residual effect for water quality in the River Avon SAC as a result of improved treatment and prevention of pollution from road run-off, compared with the current situation, as set out in ES Table 11.10 [APP-049].	RR-2366
Disagreement with the statement that there will be no indirect impact on fish from noise and vibration. There are potential risks from construction activities (e.g. noise, vibration and increased siltation from the works). The ES should include an assessment of all potential impacts from both the	During construction, the Rivers Till and Avon will be protected by mitigation measures contained within the Outline Environmental Management Plan (OEMP) [APP-187], to avoid, for example, spillages discharging to ground and polluting the rivers (PW-WAT1 and WAT2, and MW-WAT1, WAT2, WAT6, WAT7, and WAT15), which is secured through paragraph 4 of schedule 2 of the draft Development Consent Order [APP-020]. Other measures, specifically for the avoidance of indirect impacts on fish from noise and vibration, include programming construction of the River Till viaduct so as much work as possible is done while the Winterbourne River is seasonally dry and if the river was flowing low noise methods would be used, as set out in ES Section 8.8, paragraph 8.8.25 and secured in the OEMP (MW-G9 and MW-BIO3) The potential impacts on fish during construction and operation (including from noise and vibration) have been assessed and reported in ES Chapter 8, Biodiversity [APP-046]. The overall conclusion is that fish species	RR-2331

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>construction works and the operation upon fish within both watercourses.</p>	<p>within the study area will experience no adverse effects, as set out in 8.9.95 – 8.9.102 of ES Chapter 8. During operation, there is likely to be a moderately beneficial residual effect for water quality in the River Avon SAC as a result of improved treatment and prevention of pollution from road run-off, compared with the current situation, as set out in ES Table 11.10 [APP-049].</p>	
<p>Concerned about the potential for increase in recreational disturbance at Normanton Down RSPB reserve following the removal of the existing carriageway with the likelihood of rendering it less favourable for stone curlew. Highways England should work with the relevant stakeholders to develop an acceptable solution to mitigate adverse impact on stone curlew at Normanton Down. A strategy will need to be developed to safeguard the stone curlew's status including: a set of mitigation measures to avoid disturbance, a Scheme to monitor the number and breeding success of the nesting stone curlews and appropriate compensation measures.</p>	<p>The assessment and approach to mitigation for stone curlew is described in ES Chapter 8, Biodiversity [APP-046] and the assessment has concluded that no likely significant effects, including from recreational disturbance, would result on breeding birds, as set out in paragraph 8.9.35. The assessment and approach to mitigation and enhancement for stone curlew has been developed in consultation with the RSPB and Natural England. Provision of an additional stone curlew plot has been agreed with RSPB at Winterbourne Down to improve resilience of the stone curlew population in the area.</p>	<p>RR-2288, RR-2303, RR-2134, RR-2201, RR-2088, RR-2220</p>
<p>The Scheme presents significant opportunity to achieve the Lawton principles of landscape scale</p>	<p>The Scheme is pursuing a landscape-scale approach, consistent with the Lawton principles, to mitigation and connectivity and enhancement) which, using a combination of green bridges, bunds, new planting of calcareous grassland, trees, hedgerow and shrubs, will see the creation and subsequent management of a mosaic of high-quality habitats. The principles of the creation</p>	<p>RR-1003</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>conservation. In particular, this relates to the strategic connectivity for chalk grassland habitats and associated species.</p>	<p>of such habitats are set out in the Outline Landscape and Ecology Management Plan ('OLEMP') [APP-267]. Under requirement 8 of Schedule 2 of the DCO [APP-020], Highways England will be required to submit a detailed landscaping scheme, which is required to be on the basis of the mitigation measures set out in the ES, which includes the OLEMP.</p>	
<p>We welcome the creation of new chalk grassland but would like to understand the mechanisms by which this will be achieved, maintained and monitored.</p>	<p>Chemical testing and assessment of the physical characteristics of the chalk samples obtained from the ground investigation surveys undertaken indicates that, with treatment to reduce water content, which will take place at the Slurry Treatment Plant, the material will be suitable for use in creating the chalk grassland. The principles of creation and management of this land are set out in the Outline Landscape and Ecology Management Plan ('OLEMP') [APP-267]. Under requirement 8 of Schedule 2 of the DCO [APP-020], Highways England will be required to submit a detailed landscaping scheme, which is required to be on the basis of the mitigation measures set out in the ES, which includes the OLEMP.</p> <p>Monitoring arrangements will be set out in the handover environmental management plan (HEMP), which will be produced by the main works contractor.</p>	<p>RR-1003</p>
<p>Highways England must ensure their final design avoids pollution, road salt run off and direct/indirect impacts on the ecology of the River Avon SSSI & SAC.</p>	<p>As set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], Section 11.9, the assessment shows no significant changes to hydrology, surface water quality or groundwater quality during either the construction or operational phases of the Scheme. The ecology of the River Avon SSSI & SCA will not be adversely affected, as reported in ES Chapter 8, Biodiversity [APP-046], Section 8.9, with the implementation of mitigation measures contained within the Outline Environmental Management Plan (OEMP) [APP-187], to avoid, for example, spillages discharging to ground and polluting the rivers (PW-WAT1 and WAT2, and MW-WAT1, WAT2, WAT6, WAT7, and WAT15), which is secured through paragraph 4 of schedule 2 of the draft Development Consent Order [APP-020]. During operation, the magnitude of impacts from the Scheme's Road Drainage Strategy have been assessed as a moderately beneficial residual effect for water quality in the River Avon SAC as a result of improved treatment and prevention of pollution from road runoff, compared with the current situation, as set out in ES Table 11.10 [APP-049].</p>	<p>RR-0183</p>
<p>Exemplary mitigation for any potential impacts on</p>	<p>The Scheme's objectives include the aim of improving biodiversity along the route. This is being achieved in a number of ways, including removing the A303 and connecting habitats within much of the WHS and extending the chalk grassland adjacent to the Parsonage Down NNR. The</p>	<p>RR-0445, RR-1217, RR-1583</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
biodiversity is expected.	principles of this habitat creation are set out in the Outline Landscape and Ecology Management Plan ('OLEMP') [APP-267]. Under requirement 8 of Schedule 2 of the DCO [APP-020], Highways England will be required to submit a detailed landscaping scheme, which is required to be on the basis of the mitigation measures set out in the ES, which includes the OLEMP. The ecological impact assessment, including the assessment of effects and the identification of mitigation requirements, has been undertaken in accordance with the relevant legislation and policy, as set out in ES Chapter 8, Biodiversity [APP-046], Section 8.2, and industry standards, guidance, and best practice, as set out in Section 8.3. Further details of design, mitigation, and enhancement measures in the context of biodiversity are provided in Section 8.8. More specifically, details of the biodiversity gains can be found in the ES Section 8, 8.8.14 – 8.8.21, 8.9.65 – 8.9.66, and Table 8.14, <i>Habitat losses and gains associated with the Scheme</i> .	
Concerns regarding Habitats Directive and disagreement with HRA, notably the reliance on compensation and mitigation.	The Relevant Representations refer to the recent 'People Over Wind' European Court of Justice decision (People Over Wind and Sweetman v Coillte Teoranta (C-323/17)), which determined that measures that are intended to avoid or reduce the harmful effects of the project on European sites should not be taken into account when forming a view on likely significant effects during the screening stage of the Habitat Regulations Assessment. As set out in ES Appendix 8.24 Habitat Regulations Assessment (HRA) Likely Significant Effects Report [APP-265] paragraph 2.2.5, the screening stage reflects the implications of that judgment, and does not consider mitigation intended to avoid or reduce potentially harmful effects of the scheme on European sites. The next stage of the HRA process, Appropriate Assessment, does consider such mitigation measures in determining the potential for significant effects, as set out in detail in ES Appendix 8.25 Habitat Regulations Assessment (HRA): Statement to Inform Appropriate Assessment [APP-266].	RR-1621, RR-1683, RR-2293, RR-1947
We are concerned that the HRA does not extend to Blick Mead.	The purpose of the Habitat Regulations Assessment (HRA) is to identify any aspects of the Scheme that would have the potential to cause a likely significant effect on Natura 2000 or European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites). As the Blick Mead site has not been cited under any of these designations, the HRA is not the relevant assessment. However, the potential for the Scheme to impact on the Blick Mead site is considered in the relevant topic assessments of the ES: Biodiversity, Chapter 8 [APP-046] Appendix 8.9C Aquatic macroinvertebrate survey, Cultural Heritage, Chapter 6 [APP-046]; and Road Drainage and Water Environment, Chapter 11 [APP-049], with detailed consideration presented in the Blick Mead Tiered Assessment, ES Appendix 11.4, Annex 3, Blick	RR-2355

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	Mead Tiered Assessment [APP-282], which concludes that the Scheme will have no adverse effects on Blick Mead.	
Unable to respond fully without access to the confidential ecology reports.	<p>As part of the A303 Scheme, certain protected and notable species reports have been made confidential, due to the sensitive nature of the information detailed within the report. These have been justified below:</p> <ul style="list-style-type: none"> • Breeding bird - The report contains sensitive information on breeding birds notable for their protected and conservation status and which are prone to disturbance and persecution (including Schedule 1 species); • Badger - This report contains the locations of badger setts. As badgers are regularly subject to persecution, the location of their setts should be kept confidential; • Advanced bat surveys - This report contains detailed information and photographs of private residential properties; • Bat roost - This report contains detailed information and photographs of private residential properties; and • Riparian mammal - This report contains the location of sensitive possible breeding site / natal holt. As such the information has been classified as being confidential. <p>The ecological impact assessment, which includes consideration of the above-mentioned species/species groups, has been developed in consultation with the relevant statutory and non-statutory stakeholders, including Wiltshire Council Ecologist and Natural England, who have endorsed the scope and findings of the baseline data collection and the baseline reports, including those deemed listed above, as summarised in ES Chapter 8, Biodiversity [APP-046], Section 8.3.</p>	RR-1432
Disturbance of rare bird species (stone curlew and great bustard).	In relation to stone curlew, Paragraphs 8.9.25 - 38, and 8.9.138 - 140 in ES Chapter 8, Biodiversity [APP-046], explain that construction of the Scheme would result in the permanent loss of a known stone curlew breeding plot at the western end of the Scheme. Elsewhere along the Scheme, including at the Normanton Down RSPB reserve, the effect on stone curlew has been assessed as being neutral and not significant. The potential for stone curlews to nest outside managed stone curlew plots would be kept under observation and managed through the Outline Environmental Management Plan [APP-187] (PW-BIO5 and MW-BIO8), which is secured	For a list of all relevant reps that raised this issue, please refer to Appendix F.

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>through paragraph 4 of schedule 2 of the draft Development Consent Order [APP-020]. The assessment and approach to mitigation and enhancement for stone curlew has been developed in consultation with Natural England and the RSPB. A new stone curlew breeding plot would be created within Parsonage Down SSSI and NNR. The plot would be created, in agreement with Natural England, approximately 500 metres from the plot to be lost. Provision of an additional stone curlew plot has been agreed with RSPB at Winterbourne Down to improve resilience of the stone curlew population in the area.</p> <p>In relation to great bustards, while the Scheme's construction would cause a temporary loss of arable farmland that may provide habitat, the result would be neutral and not significant as great bustards are primarily an open grassland species, unlikely to access the road. Extensive areas of chalk grassland to be created as part of the scheme would potentially provide future foraging areas and the tunnel would improve habitat connectivity. Further information can be found in ES Chapter 8, Biodiversity [APP-046], Paragraphs 8.9.141 - 144.</p>	

8 Environmental Impact Assessment

8.1 Overview

8.1.1 A total of 147 interested parties raised matters regarding the Environmental Impact Assessment (EIA) for the scheme in their relevant representations.

8.1.2 Table 8-1 provides a summary of the key issues raised in relation to EIA, alongside a response from Highways England.

Table 8-1: Environmental Impact Assessment

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Very harmful to the environment.	The Scheme will deliver many environmental benefits, including for the WHS landscape; for ecological connectivity; for Winterbourne Stoke; and for the nearby communities that are affected by high levels of rat-running traffic. Full details of all the environmental effects can be found in the Environmental Statement [APP-039 to APP-054], and an overview can be found in Non-technical summary of the ES [APP-292]. As part of the EIA process, and secured as a requirement of the draft DCO [APP-020] (paragraph 4 of Schedule 2), an Outline Environmental Management Plan (OEMP), ES Appendix 2.2 [APP-187], has been developed that sets out general and topic-specific principles and requirements for the control, mitigation and monitoring of Scheme impacts.	For a list of RR that raised this issue, please see Appendix G.
The A303 proposal runs contrary to the recently published 25 Year Environment Plan.	<p>Two key objectives of the Scheme are: To help conserve and enhance the World Heritage Site and to make it easier to reach and explore; and to improve biodiversity and provide a positive legacy for nearby communities, which align closely with many of the core themes of the Government's 25 Year Environment Plan (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf), notably those in relation to: thriving plants and wildlife; and enhancing beauty, heritage, and engagement with the natural environment.</p> <p>The Scheme will deliver many environmental benefits including: for the WHS landscape; for Winterbourne Stoke; for the nearby communities that are currently affected by high levels of rat-running traffic; for biodiversity and ecological connectivity; and for local people and visitors to the area who will benefit from greatly improved access and connectivity throughout the immediate</p>	RR-0134, RR-1138, RR-1672

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>landscape.</p> <p>Full details of all the environmental benefits of the Scheme can be found in the Environmental Statement [APP-039 to APP-054], and an overview can be found in Non-technical summary of the ES [APP-292].</p>	
<p>Design proposals should seek to minimise noise and light impacts.</p>	<p>The design has been developed and refined to minimise as far as is practicable the potential for visual (light) and noise impacts, including through the removal of lighting at Longbarrow junction, no new road lighting except under Green Bridge No. 4 and Countess where such lighting will be controlled to avoid impacts (see items D-CH9-12 of the Outline Environmental Management Plan [APP-187] (OEMP)), provision of environmental screens and noise barriers (item D-NOI12 of the OEMP), and use of thin road surfacing (item D-NOI11 of the OEMP). Within and adjacent to the WHS, vehicle lights will be invisible or screened within the tunnel, under the wide Green Bridge No. 4 or in deep cutting. During construction, mitigation and control measures will require be implemented to reduce or avoid noise and artificial lighting effects pursuant to the OEMP. Both construction and operational mitigation measures are set out in the OEMP compliance with which is secured through paragraph 4 of Schedule 2 to the DCO [APP-020].</p>	<p>RR-1834</p>
<p>Concerned about an ancient community and nature.</p>	<p>While the Scheme will have some heritage and biodiversity impacts, in overall terms it will deliver heritage and biodiversity benefits through, amongst other things, transforming the WHS landscape around Stonehenge and creating areas of new chalk grassland. Full details of all the environmental effects in relation to heritage and nature can be found in the ES, Chapter 6, for cultural heritage [APP-044], and Chapter 8, for biodiversity [APP-046].</p>	<p>RR-0621, RR-0781, RR-1441</p>
<p>Have the environmental assessments taken account of all relevant policy and legislation? Specifically, do they take account of:</p> <ul style="list-style-type: none"> • The Planning Act 2008; • The World Heritage Convention and advice given by the UNESCO's World Heritage Committee 	<p>The EIA is fully compliant with the relevant overarching and topic specific legislation and policy. The overarching legislative and policy context of the EIA is set out in ES Chapter 1, Introduction [APP-039]. The topic specific legislative and policy context is set out in the Legislative and Policy Framework sections of each topic chapter [APP-043 to APP-053]. This includes, but is not limited to:</p> <ul style="list-style-type: none"> • The Planning Act 2008, as set out in ES Chapter 1 [APP-039], Section 1.3, Legislative and Policy Framework; • The World Heritage Convention, as set out in ES Chapter 6, Cultural Heritage [APP-044], Section 6.2, Legislative and Policy Framework, and Heritage Impact Assessment (HIA) [APP- 	<p>RR-1504, RR-1567, RR-1898, RR-1683, RR-1814, RR-1732, RR-1896</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>and international specialists;</p> <ul style="list-style-type: none"> • Relevant national planning policy and guidance • Local Plan policy for the World Heritage Site (WHS); • The WHS Management Plan; • The Environmental Impact Assessment Directive (85/337/EEC); • The Habitats Directive (Council Directive 92/43/EEC) and The • Conservation of Habitats and Species Regulations 2017 (Habitats Regulations); • The Bern Convention on the Conservation of European Wildlife and Habitats; • The Birds Directive (2009/147/EC); • The Aarhus Convention; • The SEA Directive (European Directive 2001/42/EC); and • The Environmental Assessment of Plans and Programmes Regulations 	<p>195], Chapter 4, Planning Policy Context. Details of the engagement with UNESCO's World Heritage Committee and international specialists are provided in the Consultation Report [APP-026], Chapters 2 and 3;</p> <ul style="list-style-type: none"> • Relevant national planning policy and guidance is set out in the Legislative and Policy Framework sections of each topic chapter [APP-043 to APP-053]; • Local Plan policy for the World Heritage Site (WHS), as set out in ES Chapter 6, Cultural Heritage [APP-044], Section 6.2, Legislative and Policy Framework, and Heritage Impact Assessment (HIA) [APP-195], Chapter 4, Planning Policy Context; • The WHS Management Plan, as set out in HIA [APP-195], Chapter 4, and in further detail in Section 12.3, Alignment with WHS Management Plan vision, aims and policies; • The Environmental Impact Assessment Directive (now 2011/92/EU rather than 85/337/EEC), compliance with which is expressed through compliance with the Infrastructure Planning (EIA Regulations) 2017, compliance with which is set out in ES Chapter 1 [APP-039], Section 1.3, Legislative and Policy Framework; • The Habitats Directive (Council Directive 92/43/EEC), as set out in ES Chapter 8, Biodiversity [APP-046], Section 8.2, Legislative and Policy Framework and the Habitats Regulations Assessment documents [APP-265 and APP-266]; • The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations), as set out in ES Chapter 8, Biodiversity [APP-046], Section 8.2, Legislative and Policy Framework and the Habitats Regulations Assessment documents [APP-265 and APP-266]; • The Bern Convention on the Conservation of European Wildlife and Habitats, which was brought into UK law by the Wildlife and Countryside Act 1981 and is discussed in in ES Chapter 8, Biodiversity [APP-046], Section 8.2, Legislative and Policy Framework; • The Birds Directive (2009/147/EC), as set out in ES Chapter 8, Biodiversity [APP-046], Section 8.2, Legislative and Policy Framework and the Habitats Regulations Assessment documents [APP-265 and APP-266]; • In relation to the SEA Directive (European Directive 2001/42/EC) and its implementing Environmental Assessment of Plans and Programmes Regulations 2004, the Applicant notes that the consenting framework for strategic road improvements is set mainly by the National Networks NPS (NNNPS). The "<i>south-west corridor</i>" proposal, although it calls itself a programme in some literature, is not a plan or programme within the meaning of the SEA 	

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
2004.	<p>Directive. In the context of the DCO, the plan or programme which constrains the decision making (and requires an SEA) is the NNNPS. Therefore, Highways England does not consider that an SEA is required for the corridor approach and such an assessment has not been undertaken.</p> <ul style="list-style-type: none"> The Aarhus Convention is not relevant to the <u>assessment</u> of environmental impacts – its focus is on access to information, public participation and access to justice. 	
The current Scheme proposal will result in an increase in traffic and pollution and damage to the landscape.	<p>Department of Transport projections indicate continued growth in traffic on the country's strategic road network, leading to worsening problems on the A303. A traffic model has been prepared for the Scheme which projects traffic growth into the future. This information is used to ensure that the design has sufficient capacity to accommodate the forecast growth. Further information can be found in the Transport Assessment [APP-297]. The potential for the Scheme to cause pollution or damage to the landscape is considered in the relevant topic chapters of the ES, including Chapter 5, Air Quality [APP-043], Chapter 7, Landscape and Visual Impact Assessment [APP-045], and Chapter 9, Noise and Vibration [APP-047]. The assessment has concluded that, in relation to traffic, there would be: no significant adverse impacts on air quality; in respect of landscape effects many beneficial effects but with permanent adverse effects at Countess Farm and the River Till and to the west of the Scheme in the opening year; and for noise mostly beneficial effects with adverse effects for some individual properties. Various mitigation measures have been put forward through the requirements of the draft DCO [APP-020] found in Schedule 2 of that document (for example, a detailed landscaping scheme to be approved by the Secretary of State following consultation with Wiltshire Council) and the OEMP [APP-187] (which in itself is secured by paragraph 4 of Schedule 2 of the draft DCO [APP-020]).</p>	<p>RR-0198, RR-0235, RR-0193, RR-0079, RR-0207, RR-0539, RR-0551, RR-0603, RR-0667, RR-0762, RR-0784, RR-1278, RR-1303, RR-1339, RR-1342, RR-1229, RR-1372, RR-1309, RR-1368, RR-1441, RR-1465, RR-1421, RR-1514, RR-1554, RR-1050, RR-1065, RR-1074, RR-1248, RR-1621, RR-1559, RR-1731, RR-1714, RR-1884, RR-1706, RR-2269, RR-1876, RR-1771, RR-1922, RR-1719, RR-2214, RR-2125, RR-1672, RR-1981, RR-2123</p>
Any final decision on the Scheme, or any individual element of it, can only be undertaken once the design is	<p>Your comment is noted. The information that is needed to support the DCO application is contained with the Scheme's submission. Highways England will continue to engage with relevant bodies through future stages of the Scheme design, as appropriate and as secured through the OEMP [APP-187] and DCO [APP-020].</p>	<p>RR-2126</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
finalised.		
Measures to avoid, reduce or mitigate the impacts of noise and light pollution need to be incorporated into the proposed Scheme, including in relation to the dark sky environment of the WHS and the impact on the solstice events	The Scheme's design has been developed and refined to minimise as far as is practicable the potential for visual (light) and noise impacts. This includes the use of cuttings, environmental bunds and screens, and noise barriers, along with the use of a thin road surface system, which will generate lower noise levels than standard hot rolled asphalt, and restrictions on lighting at relevant locations. These lighting restrictions are set out in the Outline Environmental Management Plan (OEMP) [APP-187] at items D-CH8 to D-CH12, compliance with which is secured through paragraph 4 of Schedule 2 of the draft DCO. Within the WHS, vehicle lights will be invisible or screened within the tunnel, under the wide Green Bridge No.4 or in deep cutting. Full details of the noise and visual assessments are provided in ES Chapter 9, Noise and Vibration [APP-047] and Chapter 7, Landscape and Visual [APP-045]. The potential impact of the Scheme upon dark skies has been assessed in the Heritage Impact Assessment [APP-195], Section 9.3, paragraphs 9.3.13 – 9.3.19, which concludes that the Scheme would have a Moderate Positive impact on this aspect of the WHS, resulting in a Large Beneficial effect. Due to the deep road cutting in the western portal approaches vehicular lights would not intrude on the winter solstice sunset alignment and would not create a night time glow. It is assessed that the Scheme would have a large beneficial effect overall on this Attribute of the OUV of the WHS, as concluded in the Heritage Impact Assessment (HIA), ES Appendix 6.1 [APP-195].	RR-0034, RR-1288, RR-2357, RR-2202, RR-2353, RR-1536
Full and detailed Environmental and Heritage Impact Assessments will need to form part of the further work to be undertaken by Highways England.	A full Environmental Impact Assessment (EIA) has been undertaken and is presented in the ES submitted with the DCO application [APP-039 – APP054]. The ES includes a detailed Heritage Impact Assessment (HIA), as set out in ES [APP-195].	RR-1441
The potential for impacts associated with electric and magnetic fields (EMF) wasn't considered in the EIA.	The potential for impacts associated with electric and magnetic fields (EMF) has been considered in ES, Chapter 13 People and communities [APP-051], see Table 13.14. While the Scheme includes the installation of underground electric cables within the Scheme boundary, compliance with relevant power cable design and installation legislation would mean no adverse effects can be anticipated. As such, the potential for EMF effects was scoped out of further assessment through the EIA process. Public Health England has accepted this being the case in a letter to the Planning Inspectorate dated 25 February 2019.	RR-1601
Lack of Strategic	The consenting framework for strategic road improvements is set mainly by the National	RR-0034, RR-0098,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>Environmental Assessment for corridor.</p>	<p>Networks NPS (NNNPS).</p> <p>The “<i>south-west corridor</i>” proposal, although it calls itself a programme in some literature, is not a plan or programme within the meaning of the SEA Directive. In the context of the DCO, the plan or programme which constrains the decision making (and requires an SEA) is the NNNPS. Therefore, Highways England does not consider that an SEA is required for the corridor approach.</p>	<p>RR-0870, RR-1621, RR-1661</p>
<p>Outdated / incorrect information has been used in the ecological assessments which distorts the view of the current situation</p>	<p>The ecological impact assessment (EclA), as presented in ES Chapter 8, Biodiversity [APP-046], presents an accurate picture of the biodiversity baseline at the time the various surveys were completed. The EclA, including the ecological surveys that informed it, has been carried out in accordance with the relevant guidance and best practice, including the Ecological Impact Assessment methodology published by the Chartered Institute of Ecology and Environmental Management and Highways England's Interim Advice Note 130/10, a component part of the Design manual for Roads and Bridges (DMRB). The assessment has been undertaken in consultation with relevant stakeholders, including, but not limited to, the Wiltshire Council County Ecologist, Natural England, Environment Agency, and the RSPB.</p> <p>Where required ahead of both Preliminary and Main Works, ecological surveys will be updated in-line with species-specific guidance on survey data longevity/validity (as is secured by the 'BIO' items in the Outline Environmental Management Plan [APP-187], compliance with which is secured by paragraph 4 of Schedule 2 to the DCO), ensuring that any future design development and all proposed works are informed by relevant survey data and impacts on protected species are avoided.</p>	<p>RR-1432, RR-1740</p>
<p>We feel that an opportunity is missed through the decision to reinstate (current) agricultural use to the floodplain directly underneath and adjacent to the viaduct following completion of the Scheme. From a landscape connectivity point of view this should be</p>	<p>The area of land mentioned is not required permanently for the Scheme and it will be for the relevant landholders to determine the future use of those areas. However, the Scheme is pursuing a landscape scale approach to mitigation and connectivity. This approach, using a combination of green bridges, bunds, new planting of calcareous grassland, trees, hedgerow and shrubs, will see the creation of diverse high-quality habitats.</p> <p>While further enhancement/restoration opportunities such as the one proposed fall outside of the scope of the Scheme and its DCO, Highways England is working with the relevant stakeholders</p>	<p>RR-1032, RR-2363, RR-2296</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
altered to river accompanying wetland area.	to identify opportunities for additional legacy benefits like this to be pursued by other means.	
Was your environmental assessment undertaken by experts in their respective fields and can the assessments be trusted? Particular concerns about the likely lack of knowledge of the historical significance of the WHS.	Yes. The EIA was undertaken by competent experts with the relevant and appropriate experience in their respective topics. A summary of the experience of the EIA team is presented in Appendix 1.1, Competent Expert Table [APP-185]. Further, in relation to the WHS and the wider heritage aspect of the Scheme, Highways England has engaged closely with a number of key heritage stakeholders, including Wiltshire Council Archaeology Service (WCAS), Historic England, National Trust, and English Heritage throughout the Scheme's development. Since the announcement of the preferred route in September 2017, advice has also been taken from a Scientific Committee of eminent archaeologists.	RR-0783
The Scheme will cause sprawl developments along the corridor.	Any development brought forward in the corridor will, under both the Town and Country Planning Act 1990 and Planning Act 2008 regimes, be considered on its merits, including any cumulative impacts it may cause either with the A303 scheme or with other developments in the vicinity. The cumulative effects assessment for the Scheme [APP-053] does not indicate any cumulative impacts arising from the Scheme alongside developments that are currently known in the corridor.	RR-1794, RR-1671, RR-2208
Concern that the Scheme will set a precedent for developing in protected landscapes such as National Parks and other World Heritage Sites.	No scheme will be able to set such a precedent for a following scheme. Under both the Town and Country Planning Act 1990 and Planning Act 2008 regimes, each application must be considered on its merits, including any impacts it may cause to protected landscapes. This includes assessing the application against planning policies and legislation, which at both a local and national level, provide protection to landscapes such as National Parks and World Heritage Sites.	RR-0146, RR-0043, RR-0770, RR-0765, RR-1253, RR-0885, RR-1085, RR-1135, RR-1797, RR-1771, RR-1971, RR-1659, RR-2265

9 Landscape and Visual Effects and Design

9.1 Overview

- 9.1.1 A total of 71 interested parties raised matters regarding landscape and visual effects and design of the scheme in their relevant representations.
- 9.1.2 Table 9-1 provides a summary of the key issues raised in relation to landscape and visual effects and design, alongside a response from Highways England.

Table 9-1: Landscape and Visual Effects and Design

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Retain the Nile Clumps.	The Scheme will avoid direct impact on the Nile Clumps, as set out in ES Chapter 7, landscape and Visual [APP-045], paragraph 7.9.19.	RR-0613, RR-1621, RR-0787
The Scheme will disfigure the landscape, it should be designed to blend into it.	The approach to integrating the road into the existing landscape is set out in the Design and Access Statement [APP-295]. The approach includes the provision of bunds and false cuttings, with sympathetic regrading of earthworks to match the existing natural rolling landform, along with the provision of new hedgerows and planting areas. This will be secured as part of the landscaping scheme to be approved and implemented pursuant to requirement 8 of the DCO [APP-020]. Within the central part of the WHS, the removal of the existing surface road will greatly enhance the landscape, improving tranquillity. The impact of the Scheme on the landscape has been assessed and the results of that assessment are reported in ES Chapter 7 [APP-045].	RR-0134, RR-0093, RR-0555, RR-0594, RR-0453, RR-0361, RR-0359, RR-0584, RR-0358, RR-0436, RR-0846, RR-1359, RR-1514, RR-1579, RR-1140, RR-1593, RR-1727, RR-1631, RR-1771, RR-1754, RR-1944, RR-2359, RR-1940, RR-2300, RR-1954
Can you provide additional viewpoints? Significant locations were ignored in the viewpoints presented.	It would not be feasible to provide viewpoints from every residential property. Instead, the Landscape and Visual Impact Assessment, as presented in ES Chapter 7 [APP-045], has used 36 representative viewpoints to convey the visual context of the study area and likely views of the Scheme. The viewpoints were agreed with Wiltshire Council and represent a range of close,	RR-1898

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	middle and long-distance views from varying receptor groups, including residents, recreational users, motorists and tourists.	
The design should blend into the existing landscape to reduce the impact.	The approach to integrating the new road into the existing landscape is set out in the Design and Access Statement, [APP-295]. The approach includes the provision of bunds and false cuttings, with sympathetic regrading of earthworks to match the existing natural rolling landform, along with the provision of new hedgerows and planting areas. This will be secured as part of the landscaping scheme to be approved and implemented pursuant to requirement 8 of the DCO [APP-020]. Within the central part of the WHS, the removal of the existing surface road will greatly enhance the landscape, improving tranquillity. The impact of the Scheme on the landscape has been assessed and the results of that assessment are set out in ES Chapter 7 [APP-045].	RR-0839, RR-2329, RR-2370
Was the WHS landscape originally wooded, were there trees? If so, does the proposed Scheme aim to honour this?	The early WHS landscape has traditionally been assumed to have been a wooded landscape which was inhabited and increasingly modified by Mesolithic and Neolithic populations, leading to large-scale woodland clearances. However, current interpretations, based on archaeological evidence, suggest a more open landscape, akin to wood pasture – grassland or heathland used for grazing with some areas of woodland, open-grown trees, groves and scrub. The present-day landscape is the product of modern agriculture, with extensive areas reverted to grassland on National Trust land. Current policy in the WHS Management Plan is to minimise new planting in the WHS and the Scheme will focus on establishment of chalk grassland rather than tree planting.	RR-2121, RR-2162, RR-0890
It seems a shame to destroy surrounding countryside for the benefit of supposedly saving one part.	<p>The preferred route was chosen, and the design has subsequently been developed to limit the potential for impact on the environment, including in relation to landscape and visual receptors. Details of design development are provided in ES Chapter 3, Assessment of Alternatives [APP-041]. As set out in the Design and Access Statement, [APP-295], the new road will be sensitively integrated into the existing landscape, including through the use of bunds and false cuttings, sympathetic regrading of earthworks to match the existing natural rolling landform, and extensive planting of new hedgerows, shrub and grassland. This will be secured as part of the landscaping scheme to be approved and implemented pursuant to requirement 8 of the DCO [APP-020].</p> <p>As summarised in ES Chapter 7, LVIA [APP-045], Tables 7.7 and 7.9, the assessment has identified a number of significant adverse and significant beneficial effects, for both landscape</p>	RR-0667, RR-0782, RR-1393, RR-1353, RR-1451, RR-0959, RR-1118, RR-1671, RR-2166, RR-2288, RR-2134, RR-2201, RR-2088, RR-2220

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	receptors and visual receptors in year 1 of operation. However, as described in paragraphs 7.9.64 – 7.9.79 and summarised in Table 7.9, with the establishment of mitigation planting and the integration of the Scheme into the landscape, the majority of the significant adverse effects will have been reduced to non-significant by year 15 of operation.	
There are no topographical comparisons provided to allow comparison and contrast of the proposed earthworks vs current landform.	The Landscape and Visual Impact Assessment, as set out in ES Chapter 7 [APP-045], includes a selection of visualisations illustrating the landscape without the Scheme, with the Scheme at year 1 of opening, and with the Scheme at year 15 of operation [APP-129 – APP-146]. These visualisations show the comparison between the current landform and the Scheme as seen from a selection of representative viewpoints.	RR-2108, RR-2354, RR-1606, RR-2345
The Scheme is visually intrusive.	Great care has been taken in minimising the Scheme's visual impact. The approach to integrating the new road into the existing landscape is set out in the Design and Access Statement, Application Document 7.2 [APP-295]. The new road will be sensitively integrated into the existing landscape, including through the use of bunds and false cuttings, sympathetic regrading of earthworks to match the existing natural rolling landform, and extensive planting of new hedgerows, shrub and grassland. This will be secured as part of the landscaping scheme to be approved and implemented pursuant to requirement 8 of the DCO [APP-020]. The potential for landscape and visual impacts is considered in the landscape and visual impact assessment, ES Chapter 7 [APP-045], Section 7.9. While recognising several temporary adverse effects during construction, as summarised in ES Table 7.12, the Scheme will deliver a large number of permanent significant beneficial landscape and visual effects, as summarised in ES Tables 7.13 and 7.14.	RR-0014, RR-0208, RR-0456, RR-0449, RR-0584, RR-0683, RR-1353, RR-1255, RR-1462, RR-1456, RR-1514, RR-1029, RR-0870, RR-1608, RR-1585, RR-1816, RR-2370, RR-2194, RR-1364
There will be a significant impact on the Nile Clumps. They should be protected during the works.	The Scheme will avoid direct impact on the Nile Clumps, as set out in ES Chapter 7, landscape and Visual [APP-045], paragraph 7.9.19.	RR-0613, RR-0613, RR-0787
In the area between Stonehenge Cottages and the Eastern Tunnel, the proposals appear to replace tree cover with chalk grassland. Woody vegetation should be retained in situ with hedge planting	It is not proposed that any existing trees in the vicinity of Stonehenge Cottages be removed. In relation to existing vegetation generally, specific provisions with respect to the retention and protection of such vegetation are set out at MW-LAN1, MW-LAN3 and MW-G28 of the Outline Environmental Management Plan (OEMP) [APP-187] which is secured by paragraph 4 of Schedule 2 of the draft Development Consent Order [APP-020].	RR-0846

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>along the south west side of the Amesbury road to improve the situation for bats.</p>	<p>The extent of planting within the Scheme must be balanced against the open character of the landscape and the ambitions of the WHS Management Plan, which seeks to avoid new planting within or adjacent to the WHS. As such, given the location of the eastern tunnel portal in the WHS, it is not proposed to plant in this location. More generally, the potential for the Scheme to impact on bats, bat roosts and bat flight paths is assessed in ES Chapter 8, Biodiversity [APP-046], Section 8.9. As well as avoiding direct impacts on known bat roosts, the Scheme would provide new bat hibernacula to enhance opportunities for bats. Additionally, the Scheme is pursuing a landscape-scale approach to mitigation and connectivity which, supported by the provision of four green bridges, will see the creation of a linked mosaic of high-quality habitat of potential value for foraging. During construction, works involving felling or maintenance on trees with potential for bat roosts will follow best practise methods to protect bats and their roosts, as set out at PW-BIO7 of the REAC table in the OEMP, and bat monitoring is required to be undertaken during construction in accordance with MW-BIO10.</p> <p>Overall the assessment concludes there will be no significant effects on bats, though, at year 15 of operation, a slight beneficial effect would be recognised at a local level due to the maturation of new habitat, ES Chapter 8, paragraph 8.9.156 [APP 046].</p>	
<p>All artificial lighting should be sited so as not to cause light intrusion or nuisance to residential dwellings in the area adjacent to the Scheme.</p>	<p>The proposed Scheme will have no lighting within the WHS beyond that necessary within the tunnel and beneath the c. 150 metre wide Green Bridge No. 4 near Longbarrow junction. There will be no lighting within the open cutting, and tunnel lighting will be designed to minimise light spill outside of the tunnel portals. Lighting under Green Bridge No. 4 will only operate during daylight hours. There will be no roadside lighting at the new Longbarrow Junction, and the improved Countess junction will utilise new directional roadside lighting to minimise light spill. This lighting is provided for in the Outline Environmental Management Plan (OEMP) [APP-187] (D-CH9 to D-CH12), and paragraph 4 of Schedule 2 of the DCO [APP-020] requires the scheme to be carried out in accordance with the OEMP. These are significant improvements over the current situation, where both Countess and Longbarrow junctions are brightly lit.</p> <p>In addition, for the Scheme's construction, as part of the full EIA process, an Outline Environmental Management Plan (OEMP) has been prepared that sets out general and topic-specific principles and requirements for the control, mitigation and monitoring of potential construction impacts, including in relation to light nuisance from artificial lighting in the context of impacts on residential dwellings (see MW-G29, MW-BIO4, PW-BIO7, D-CH9 of the OEMP).</p>	<p>RR-2283</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>These control, mitigation and monitoring requirements underpin the assessment of the potential for intrusive lighting impacts during construction, as set out in ES Chapter 7, Landscape and Visual Impact Assessment [APP-045]. Highways England's appointed contractor will be required to develop and implement a detailed Construction Environmental Management Plan (CEMP), based on the OEMP.</p>	
<p>LVIA misrepresents landscape and visual effects and omits adequate mention of adverse impacts in summaries.</p>	<p>The LVIA (Landscape and Visual Impact Assessment), ES Chapter 7 [APP-045], fully and properly presents the range of landscape and visual effects, including the adverse impacts of the Scheme. Impacts have been assessed for construction, year 1 and year 15 phases of the Scheme based upon the likely impacts to receptors, in accordance with industry accepted guidance, namely the Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 and Interim Advice Note 135/10, 2010 (http://www.standardsforhighways.co.uk/ha/standards/ians/pdfs/ian135.pdf). The LVIA methodology, including the choice of receptors was agreed with Wiltshire Council. The LVIA methodology, legislative and policy framework is set out in ES Chapter 7 [APP-045]. The adverse impacts are set out for each of the above phases in Section 7.9 along with summary tables which clearly state the effects (both beneficial and adverse) along with reference to Appendix 7.7 [APP-227] and Appendix 7.8 [APP-228] where all effects are stated in full. ES Chapter 16: Summary [APP-054] states that it is a high-level summary in paragraph 16.1.1 and refers to the main ES Chapters. The LVIA summary within ES Chapter 16 is in line with the reporting of all other environmental disciplines and includes adverse impacts, with adverse assessments for construction and operational phases.</p> <p>The Non-Technical Summary [APP-292] similarly includes reference to adverse impacts and is an accurate summary of the LVIA findings.</p>	<p>RR-1032, RR-1898</p>
<p>A number of category A and category B trees, either wholly within or with root protection zones within the Scheme red line boundary around Countess roundabout could be affected. There are concerns as to whether adequate</p>	<p>ES Appendix 7.10, Arboricultural Impact Assessment (AIA) [APP-230], Table 8.1 summarises that no category A trees are to be removed or are at risk of removal.</p> <p>Table 8.1 does identify 48 Category B trees or tree groups to be removed across the Scheme. With reference to AIA Appendix 10 Figure 7A 'Tree Constraints Plan' the Category B trees (illustrated in blue) at Countess roundabout are to the north-east and south-east of the roundabout and adjacent to the existing A303, between Countess roundabout and the River Avon, but the majority of the trees around Countess roundabout and in this part of the Scheme</p>	<p>RR-2306, RR-1583</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>safeguarding of these veteran trees has been considered and provided for within the Scheme. Specifically, but not exclusively, the proximity of mechanical excavations, soil compaction and increased soil waterlogging arising from the proposed drainage arrangements.</p>	<p>are Category C and therefore not veteran trees. There are Category B trees at risk of removal in this area between Countess and the River Avon but the Scheme has sought to minimise tree loss. Adequate safeguarding for trees has been considered and provided for within the Scheme as set out in the Outline Environmental Management Plan (OEMP) [APP-187], ES Appendix 2.2, for the Preliminary Works [PW-LAN1] and Main Works [MW-LAN3] including construction exclusion zones and root protection areas. The OEMP also requires that the contractor shall use cellular confinement systems to minimise/avoid compaction to the ground and avoid waterlogging. The measures outlined in the OEMP would be secured through paragraph 4 of schedule 2 of the DCO [APP-020] and are considered appropriate to safeguard retained trees. The Scheme also includes new tree planting at Countess roundabout which is shown indicatively on the Environmental Masterplan [APP-059].</p>	

10 Flood Risk, Groundwater Protection, Geology and Land Contamination

10.1 Overview

10.1.1 A total of 63 interested parties raised matters regarding flood risk, groundwater protection, geology and land contamination of the scheme area in their relevant representations.

10.1.2 Table 10-1 provides a summary of the key issues raised in relation to flood risk, groundwater protection, geology and land contamination, alongside a response from Highways England.

Table 10-1: Flood Risk, Groundwater Protection, Geology and Land Contamination

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>There are likely to be seriously damaging effects on the water regime.</p>	<p>As set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], the assessment shows no significant changes to hydrology, surface water quality or groundwater quality during either the construction or operational phases of the Scheme. During the assessment, there was extensive engagement with the Environment Agency and Wiltshire Council. The extent of agreement with these organisations will be set out in the Statements of Common Ground. Monitoring of boreholes to inform detailed design is on-going. During construction, the contractor will be required to comply with the general and topic-specific principles and requirements for the control, mitigation and monitoring of potential construction impacts, including in relation to the protection of private water supplies, hydrology, land drainage, and sewage disposal from construction compounds set out in the Outline Environmental Management Plan (OEMP). The OEMP is presented in the ES Appendix 2.2 [APP-187] and is secured through Paragraph 4 of Schedule 2 of the draft DCO [APP-020]. During operation, the magnitude of impacts from the Scheme's Road Drainage Strategy have been assessed as a moderately beneficial residual effect for water quality in the River Avon as a result of improved treatment and prevention of pollution from road runoff, compared with the current situation. The Environment Agency agree that this benefit is likely, which will be recorded in the Statement of Common Ground being developed with the Environment Agency, to be submitted to the Examination in due course. New measures as described in the Road Drainage Strategy, ES Appendix 11.3 [APP-281] (compliance with which is secured pursuant to schedule 2, paragraph 10 of the draft DCO [APP-020]), will include systems to isolate any spillages and treatment</p>	<p>RR-0601, RR-0575, RR-0637, RR-0713, RR-1286, RR-1459, RR-1451, RR-1456, RR-1008, RR-1010, RR-0870, RR-1616, RR-2308, RR-2004, RR-2249, RR-2006, RR-2277, RR-2199, RR-2208, RR-2007, RR-2202, RR-2150, RR-2136, RR-2331</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	basins to improve the quality of the runoff so there will be no significant adverse effects on either groundwater or the Rivers Till and Avon. The existing road has minimal pollution control and in places none at all. The Road Drainage Strategy was developed in consultation with Wiltshire Council and the Environment Agency and compliance with it is secured pursuant to schedule 2, paragraph 10 of the draft DCO [APP-020].	
Concern about the pollution of the River Avon.	As set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], the assessment shows no significant changes to hydrology, surface water quality or groundwater quality during either the construction or operational phases of the Scheme, including at the River Avon, as set out in Section 11.9. During operation, the magnitude of impacts from the Scheme's Road Drainage Strategy (compliance with which is secured pursuant to schedule 2, paragraph 10 of the draft DCO [APP-020]) have been assessed as a moderately beneficial residual effect for water quality in the River Avon as a result of improved treatment and prevention of pollution from road runoff, compared with the current situation, as summarised in Table 11.10 The Environment Agency agree that this benefit is likely, which will be recorded in the Statement of Common Ground being developed with the Environment Agency, to be submitted to the Examination in due course.	RR-1621, RR-1683, RR-1584
Concern about the pollution of the River Till.	As set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], the assessment shows no significant changes to hydrology, surface water quality or groundwater quality arising as a result of pollution during either the construction or operational phases of the Scheme at the River Till, as set out in Section 11.9.	RR-0183, RR-2366
The Scheme will impact on groundwater, how will these impacts be mitigated?	As set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], the design has been developed and refined to avoid adverse impacts on groundwater, as summarised in section 11.8. Construction-related impacts will be managed through compliance with the various measures set out in the Outline Environmental Management Plan submitted with the DCO [APP-187] in relation to groundwater; for example, the need for a Groundwater Management Plan at item MW-WAT10. Compliance with the OEMP is secured through Paragraph 4 of Schedule 2 of the DCO [APP-020]. The assessment shows no significant impacts on groundwater during either the construction or operational phases of the Scheme, as summarised in Section 11.9.	RR-0142, RR-0306, RR-1337, RR-1898, RR-1735, RR-1999, RR-2022, RR-2069, RR-2063, RR-1957, RR-2366, RR-2178, RR-1977, RR-1980, RR-2209, RR-1954, RR-2353, R2371AS
There is insufficient information on the potential for impacts on the hydrogeology,	The Scheme groundwater model draws on the extensive data set of the Environment Agency's Wessex Basin model and has been developed in consultation with the Environment Agency and Wiltshire Council. The outcome of the full groundwater assessment is reported in ES Chapter 11,	RR-1032, RR-1621, RR-2069, RR-2363, RR-1594, RR-1584,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
a more detailed study is required.	Road Drainage and the Water Environment [APP-049], Section 11.9, which concludes that there would be no significant adverse effects on groundwater as a result of the Scheme. Ongoing ground investigations and monitoring results are being undertaken and evaluated to inform the detailed design process, in consultation with the Environment Agency and Wiltshire Council.	RR2373AS
The Scheme will lead to an increase in flood risk how will this be mitigated?	As set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], the assessment shows there will be no increase in flood risk. The River Till viaduct will span the river's floodplain and measures in the Outline Environmental Management Plan (OEMP), presented in the ES Appendix 2.2 [APP-187], will control construction activity within the floodplain such that there is no significant effect on the flow regime. Compliance with the OEMP is secured under paragraph 4 of Schedule 2 of the DCO [APP-020]. There will be no activities in the area of the River Avon that affect its flood regime. All flood risk effects were found to be non-significant, as set out in ES Appendix 11.5, Non-Significant Effects [APP-284]. Further information can be found in the Flood Risk Assessment, ES appendix 11.6 [APP-11.5].	RR-0031
Surface water quality here has been in decline for some time. How will these waters be protected during construction and operation?	<p>A full EIA has been undertaken, including a detailed assessment of the potential risks to surface water quality, as set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049]. It concludes that there will be no significant adverse effect to surface water quality arising from the Scheme. During the assessment, there was extensive engagement with the Environment Agency. The extent of agreement with the Environment Agency will be set out in the relevant Statement of Common Ground.</p> <p>As part of the full EIA process, an Outline Environmental Management Plan (OEMP) has been prepared that sets out general and topic-specific principles and requirements for the control, mitigation and monitoring of potential construction impacts, including those in relation to the prevention of pollution from construction activities. The OEMP is presented in the ES Appendix 2.2 [APP-187] and is secured under paragraph 4 of Schedule 2 of the DCO [APP-020].</p> <p>During operation, the Scheme's Road Drainage Strategy (compliance with which is secured pursuant to schedule 2, paragraph 10 of the draft DCO [APP-020]) is likely to have a beneficial effect on water quality in the River Avon as a result of improved treatment and prevention of pollution from road runoff, compared with the current situation, as summarised in ES Table 11.10 [APP-049]. The Environment Agency agree that this benefit is likely, which will be recorded in the Statement of Common Ground being developed with the Environment Agency, to be submitted</p>	RR-1727

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	to the Examination in due course.	
Have you taken account of all water abstractions in the area and can you ensure that these will not be affected by the Scheme?	Data on location and abstractions was requested and received from several sources including: the Environment Agency, Wiltshire Council, Wessex Water, the MoD, and private landowners. The information supplied has been assured and built-on through a suite of water features surveys which included questionnaires, site visits and interviews with abstraction operators. Full details of abstractions included within the assessment, including both licensed and unlicensed abstractions, are reported in the ES Chapter 11, Road Drainage and the Water Environment [APP-049], section 11.6, paragraphs 11.6.53 – 11.6.57. The assessment concluded that there would be no significant adverse impacts on water abstractions as a result of the Scheme, section 11.9.	RR-2114, RR-2108, RR-2354, RR-1606, RR-2345
The Scheme must undertake further groundwater monitoring to better understand the potential impacts of the development.	A water features survey was conducted between November 2017 and April 2018 to determine groundwater receptors and groundwater levels. Details are presented in the Groundwater Risk Assessment, ES Appendix 11.4 [APP-282]. The Scheme groundwater model draws on the extensive data set of the Environment Agency's Wessex Basin model and has been developed in consultation with the Environment Agency and Wiltshire Council. The outcome of the full groundwater assessment is reported in ES Chapter 11, Road Drainage and the Water Environment [APP-049], Section 11.9, which concludes that there would be no significant adverse effects on groundwater as a result of the Scheme. Ongoing ground investigations and monitoring results are being undertaken and evaluated to inform the detailed design process. Highways England continues to engage with the Environment Agency on matters of groundwater, including in the context of ongoing monitoring and the results of this engagement will be set out in the Statement of Common Ground between the parties to be submitted to the Examination in due course.	RR-1040, RR-1594, RR-1584
Lack of sufficient information: hydrogeology and surveys. Will this be provided?	The Scheme groundwater model draws on the extensive data set of the Environment Agency's Wessex Basin model and has been developed in consultation with the Environment Agency and Wiltshire Council. The outcome of the full groundwater assessment is reported in ES Chapter 11, Road Drainage and the Water Environment [APP-049], Section 11.9. The assessment concludes that there would be no likely significant adverse effects on groundwater as a result of the Scheme, as set out in Section 11.9. Ongoing ground investigations and monitoring results are being undertaken and evaluated to inform the detailed design process. Highways England continues to engage with the Environment Agency on matters of groundwater, including in the context of ongoing monitoring, and the results of this engagement will be set out in the	RR-2288, RR-2134, RR-2201, RR-2220

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	Statement of Common Ground between the parties to be submitted to the Examination in due course.	
<p>The present proposals do not include enhancement or restoration of the chalk stream habitat in the vicinity of the development and the River Till and River Avon System SSSIs.</p>	<p>The Scheme's objectives include the aim of improving biodiversity along the route. This is being achieved in a number of ways, including removing the A303 and connecting habitats within much of the WHS and the creation of new chalk grassland adjacent to the Parsonage Down NNR. Full details of the biodiversity gains can be found in the ES Chapter 8 [APP-046], Sections 8, 8.8.14 – 8.8.21, 8.9.65 – 8.9.66, and Table 8.14, <i>Habitat losses and gains associated with the Scheme</i>. There is likely to be a moderately beneficial residual effect for water quality in the River Avon as a result of improved treatment and prevention of pollution from road run-off, compared with the current situation, as summarised in ES Chapter 11, Road Drainage and the Water Environment [APP-049], Table 11.10. The Environment Agency agree that this benefit is likely, which will be recorded in the Statement of Common Ground being developed with the Environment Agency, to be submitted to the Examination in due course. While further enhancement/ restoration of the chalk stream habitat falls outside of the scope of the Scheme and its DCO, Highways England is working with the relevant stakeholders to identify opportunities for legacy benefits like this to be pursued by other means.</p>	RR-1032, RR-2363
<p>The road drainage and water assessment should consider the whole of the River Avon SAC designation. Changes to water levels and flows would adversely affect the features of the River Avon SAC as well as impacting on water-based recreational activities and human health. Springs and seepages along the valley are integral to supporting the river habitat.</p>	<p>The potential for the Scheme to affect European protected sites, including the potential for impacts on the River Avon SAC, has been fully assessed, as reported in ES Chapter 8, Biodiversity [APP-046], and, with regards to the habitats regulations assessment (HRA), ES Appendix 8.24 and 8.25 ([PP-264 and APP-265]. The assessment has concluded that, with the implementation of the mitigation embedded in the Scheme, there will be no likely significant adverse effects on the integrity of the SAC. This is supported by the Road Drainage and the Water Environment assessment, as set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], which concludes that there would be no significant changes to hydrology, surface water quality or groundwater quality, section 11.9. During operation, the Scheme's Road Drainage Strategy (compliance with which is secured pursuant to schedule 2, paragraph 10 of the draft DCO [APP-020]) is likely to have a beneficial effect on water quality in the River Avon as a result of improved treatment and prevention of pollution from road runoff, compared with the current situation, as summarised in ES Table 11.10 [APP-049]. The Environment Agency agree that this benefit is likely, which will be recorded in the Statement of Common Ground being developed with the Environment Agency, to be submitted to the Examination in due course. Fishing and other recreational activities associated with the rivers</p>	RR-0839, RR-1621

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>Avon and Till are considered as attributes of river importance and sensitivity, as also set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], Table 11.9, Water environment receptors, attributes and importance. Recreation, in particular fishing, is considered to be an attribute of high importance for the River Avon. As set out in Section 11.7, potential impacts on the river and associated attributes could include physical modification to the water course or reduction in water quality, including through sedimentation, pollution events, or mobilisation of contaminants. With the avoidance of physical works within the river channels and with the implementation of the mitigation measures set out in the OEMP, there would be no significant adverse effects on the River Avon, as concluded in Section 11.9. As such, it is considered that the Scheme will protect against adverse impacts on recreational river users, including on their health.</p>	
<p>Any groundwater sensitivity may be due to fluctuations in surface water entering the site through drainage ditches alongside the existing A303. Highways England must understand the role of those ditches in maintaining those waterlogged conditions at Blick Mead and ensure the Scheme has no negative impact on that flow. In relation to Blick Mead, targeted assessment of the small-scale groundwater environment within the relatively restricted area of Blick Mead would be advantageous.</p>	<p>The implications of the Scheme for the Blick Mead site have considered potential impacts on groundwater levels and flows at the site, including the influence of highway drainage on water levels, concluding that the drainage may be contributing some overland flow to the Blick Mead site, though only during times of heavy rainfall. The assessment shows that there will not be any adverse effects on spring flows at Blick Mead. However, given the interest in the site, both from members of the public and heritage bodies, hydrological monitoring at Blick Mead will continue and will include monitoring of the small-scale groundwater environment, including in relation to water levels and water quality at shallow depths. Further investigation and monitoring will be undertaken and is the subject of ongoing discussion with Historic England, the land owner and other interested stakeholders. Further information can be found in ES Chapter 11, Appendix 4, Annex 3 Blick Mead Tiered Assessment [APP-282].</p>	<p>RR-1504, RR-2209</p>
<p>The assessment should consider the uncertainties around hydrogeology and</p>	<p>The assessment does consider the uncertainties around hydrogeology, with sufficient ground investigation having been carried out to inform the assessment. There has been extensive collation of baseline hydrological data to inform a hydrological model which has been developed</p>	<p>RR-1567</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>what further information will be required to ensure risks to quality / quantity of controlled waters and from flooding are acceptable. Any requirement for further ground investigation must be identified at the earliest opportunity.</p>	<p>in consultation with the Environment Agency and Wiltshire Council. The outcome of the full groundwater assessment is reported in ES Chapter 11, Road Drainage and the Water Environment [APP-049], which concludes that there will be no likely significant adverse effects on groundwater as a result of the Scheme. Ongoing ground investigations and monitoring results are being undertaken to inform detailed design. Highways England continues to engage with the Environment Agency on matters of groundwater, including in the context of ongoing monitoring and the results of this engagement will be set out in the Statement of Common Ground between the parties to be submitted to the Examination in due course.</p>	
<p>Outputs from the impact assessment should demonstrate the potential impacts in terms of quality and quantity on groundwater and surface water receptors. The assessment should cover both the construction and operational phases (and include locations such as abstraction points).</p>	<p>A full EIA has been undertaken including a detailed assessment of the potential risks to groundwater and surface water, as set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049] and its technical appendices [APP-184 to APP-291]. The assessment shows no significant changes to hydrology, surface water quality or groundwater quality (including at locations such as abstraction points) during either the construction or operational phases of the Scheme, section 11.9. During operation, there is likely to be a moderately beneficial residual effect for water quality in the River Avon as a result of improved treatment and prevention of pollution from road run-off, compared with the current situation, section 11.9, Table 11.10. The Environment Agency agree that this benefit is likely, which will be recorded in the Statement of Common Ground being developed with the Environment Agency, to be submitted to the Examination in due course.</p>	RR-0417
<p>The Scheme could contribute to the delivery of River Avon Restoration Plan (RARP) objectives and achievement of 'favourable condition' status for the Hampshire Avon SSSI by mitigating the impact of the road.</p>	<p>The Scheme's objectives include the aim of improving biodiversity along the route. This is being achieved in a number of ways, as set out in the ES Chapter 8, Biodiversity [APP-046]. Full details of the biodiversity gains can be found in the ES Chapter 8 [APP-046], section 8, paragraphs 8.8.14 – 8.8.21, 8.9.65 – 8.9.66, and Table 8.14, <i>Habitat losses and gains associated with the Scheme</i>. In relation to the River Avon, there is likely to be a moderately beneficial residual effect for water quality as a result of improved treatment and prevention of pollution from road run-off, compared with the current situation, as summarised out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], Table 11.10. The Environment Agency agree that this benefit is likely, which will be recorded in the Statement of Common Ground being developed with the Environment Agency, to be submitted to the Examination in due course. While further contribution to the RARP falls outside of the scope of the Scheme, Highways England is working with the relevant stakeholders to identify the potential for opportunities for legacy benefits like this to be pursued by other means.</p>	RR-1032, RR-2363

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Who will be responsible for water quality and water supply during and after construction?	Highways England, as the Scheme promoter, is responsible for ensuring that groundwater resources including the supply and quality of water are protected during the construction and operation of the Scheme. As set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], Section 11.9, the assessment shows no significant changes to hydrology, private water supply, surface water quality or groundwater quality (water supply) during either the construction or operational phases of the Scheme. Highways England has been and will continue to work with Wessex Water and other statutory utility providers as required.	RR-1977, RR-1980, RR-2108, RR-2354, RR-1606, RR-2345
The private water supplies and associated hydrology and land drainage must be protected from any impacts from both the construction and operational phases of the Scheme, including any sewage disposal from construction compounds.	A full EIA has been undertaken, including a detailed assessment of the potential risks to controlled water, as set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049]. During the assessment, there was extensive engagement with the Environment Agency and Wiltshire Council. The extent of agreement with these organisations will be set out in the Statements of Common Ground to be submitted to the Examination in due course. As part of the full EIA process, an Outline Environmental Management Plan (OEMP) has been prepared that sets out general and topic-specific principles and requirements for the control, mitigation and monitoring of potential construction impacts, including in relation to the protection of private water supplies, hydrology, land drainage, and sewage disposal from construction compounds. The OEMP is presented in the ES Appendix 2.2 [APP-187] and is secured through paragraph 4 of Schedule 2 of the DCO. The EIA shows no significant changes to hydrology, surface water quality, groundwater quality, land drainage or private water supplies during either the construction or operational phases of the Scheme. During operation, there is likely to be a moderately beneficial residual effect for water quality in the River Avon as a result of improved treatment and prevention of pollution from road run-off, compared with the current situation, as summarised in ES Chapter 11, Road Drainage and the Water Environment [APP-049], Table 11.10. The Environment Agency agree that this benefit is likely, which will be recorded in the Statement of Common Ground being developed with the Environment Agency, to be submitted to the Examination in due course.	RR-2288, RR-2303, RR-1977, RR-1980, RR-2134, RR-2201, RR-2088, RR-2220
A CEMP is to be submitted to and agreed by the Local Authority prior to the commencement of the construction phase to identify mitigation measures to	As part of the EIA process, an Outline Environmental Management Plan (OEMP) has been prepared that sets out general and topic-specific principles and requirements for the control, mitigation and monitoring of potential construction impacts, including in relation to the protection of groundwater from potential contamination and pollution events. During preparation of the OEMP, there was extensive engagement with the Environment Agency and Wiltshire Council. The extent of agreement with these organisations will be set out in the Statements of Common	RR-1898

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
prevent potential contamination of ground water sources from the construction phase.	Ground. Monitoring of boreholes is ongoing. The OEMP is presented in the ES Appendix 2.2 [APP-187] and is secured through paragraph 4 of Schedule 2 of the DCO.	
Mitigation measures must be in place to prevent potential contamination of ground water sources from the final Scheme's operational infiltration road drainage system.	Existing drainage of highway run-off does not meet current standards on any part of the existing A303 from Yarnbury Castle to east of the River Avon. Drainage for the Scheme has been designed to current good practice standards and will use carrier pipes to convey run-off to drainage treatment areas where contaminates will be treated/absorbed before the run-off is discharged to ground. This will prevent potential contamination of groundwater sources, as set out in the details of the drainage solution presented in ES Appendix 11.3, Road Drainage Strategy [APP-281] (compliance with which is secured pursuant to schedule 2, paragraph 10 of the draft DCO [APP-020]). Through the use of Sustainable Drainage Systems (SuDS), the Scheme will deliver a significant improvement in road drainage quality against the existing system, which is likely to result in a moderately beneficial residual effect for water quality in the River Avon, as summarised out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], Table 11.10. The Environment Agency agree that this benefit is likely, which will be recorded in the Statement of Common Ground being developed with the Environment Agency, to be submitted to the Examination in due course.	RR-2357
Highway runoff is full of pollutants, how will this be managed?	Existing drainage of highway run-off does not meet current standards on any part of the existing A303 from Yarnbury Castle to east of the River Avon. Drainage on the Scheme will use carrier pipes to convey run-off to drainage treatment areas where contaminates will be absorbed before the run-off is discharged to ground. Details of the drainage solution are set out in ES Appendix 11.3, Road Drainage Strategy [APP-281], compliance with which is secured pursuant to schedule 2, paragraph 10 of the draft DCO [APP-020]. The Scheme will deliver an improvement in road drainage against the existing system, which is likely to result in a moderately beneficial residual effect for water quality in the River Avon, as summarised out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], Table 11.10. The Environment Agency agree that this benefit is likely, which will be recorded in the Statement of Common Ground being developed with the Environment Agency, to be submitted to the Examination in due course.	RR-1771
What are the drainage proposals / impact on field drains?	Field drainage systems and overland flows from catchments adjacent to the highway boundary will be intercepted and picked up by the Scheme's drainage proposals. The approach to drainage is set out in the Road Drainage Strategy, ES Appendix 11.3 [APP-281] (compliance	RR-1542

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>with which is secured pursuant to schedule 2, paragraph 10 of the draft DCO [APP-020]). The potential for the Scheme to impact on existing drainage is set out in ES Chapter 11, Road Drainage and Water Environment [APP-049]. The chapter concludes that there will be no adverse impacts on land drainage as a result of the Scheme.</p>	
<p>The positioning of Settlement Pond 5 creates wasteful and unnecessary land take and sterilisation. Justification of proposal has not been evidenced. Clarification and reassurance are required as to how these ponds will be maintained and how leaching will be prevented.</p>	<p>The design and positioning of drainage treatment area (DTA) 5 (Settlement Pond 5), as with other basins in the west of the Scheme is proposed at optimal outfall locations following consultation with relevant landowners. It has been designed to be as close to the new road as possible, and its location has been selected to balance operational performance with minimising land-take; the final sizing will be subject to detailed design.</p> <p>As described in paragraphs 3.2.2 to 3.2.5 and Figure 3.1 of the Environmental Statement (ES) Appendix 11.3, Road Drainage Strategy [APP-281], these DTAs are required to attenuate the highway run-off, to reduce the risk of flooding to adjacent communities, and to treat the run-off. The existing road drainage does not meet current design standards and these basins, by reducing both pollution and flood risk, would enhance the drainage by bringing it up to current design standards. The DTAs would be designed to allow treated run-off to discharge to ground, as most of the untreated highway run-off does at present.</p> <p>Leaching would be prevented by the design of the basins which would be lined with a proprietary treatment system, to be provided in the base area within the basin, to absorb contaminants before the run-off is discharged via infiltration to ground. The drainage system would also include provision to capture spillages before they reached the basins.</p> <p>Table 3.2b in the Outline Environmental Management Plan (OEMP) [APP-187] describes the requirement for a Water Management Plan that would include management of these basins. Management of the basins would be the responsibility of Highways England. Compliance with the OEMP is secured through paragraph 4 of Schedule 2 to the DCO [APP-020].</p>	<p>RR-2108, RR-2354, RR-1606, RR-2345</p>
<p>There is insufficient information on the potential for changes in hydrology to</p>	<p>A hydrological model has been developed to inform the assessment of groundwater effects. The main archaeological site exposed to risk of potential changes in hydrology is the Blick Mead site in the grounds of Amesbury Abbey, and the assessment shows there will not be any adverse</p>	<p>RR2253B1</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>impact on archaeology after the tunnel is built or how they will be managed. A Conceptual Hydrological Model is required to properly assess this.</p>	<p>effect on the spring flows which sustain the boggy ground at the Blick Mead site and the archaeology contained within it. Further information on the assessment of Blick Mead can be found in ES Chapter 11, Appendix 4, Annex 3, Blick Mead Tiered Assessment [APP-282]. Further information on the assessment of groundwater effects more generally can be found in ES Chapter 11, Road Drainage and Water Environment [APP-049].</p>	
<p>There will be adverse impacts of phosphatic chalk and radon gas from excavated materials.</p>	<p>Chemical testing and assessment of the solubility and leachate potential of the phosphatic chalk that the tunnel will bore through shows that the material does not pose a risk to controlled waters. Excavated phosphatic chalk could give rise to emissions of radon gas, which in an outside environment would disperse rapidly, posing no risk to health. Within the enclosed environment of the tunnel boring, the health of construction personnel will be protected by the mitigation measures set out in the OEMP, which include monitoring and the development of a ventilation strategy (MW-GEO5, MW-GEO10, MW-AIR3). Compliance with the OEMP is secured through paragraph 4 of schedule 2 of DCO [APP-020]. Further information on the phosphatic chalk and radon gas can be found in the ES Chapter 10, Geology and Soils [APP-048].</p> <p>We have engaged Public Health England to undertake independent testing, the results of which will be submitted to the Examination in due course.</p>	<p>RR-0031, RR-1258, RR-2209</p>
<p>What mitigation measures are being proposed in relation to geology and soils to ensure that there are no significant effects? Specifically, assurance is needed that no soil is to be exported from nor imported to the landowner's land and that no soil is to be exported from nor imported to the temporary storage compound site. Confirmation of how soils will be reinstated is also needed.</p>	<p>Mitigation to limit or avoid impacts on geology and soils receptors has been inherent within the design and development of the scheme and has been informed by comprehensive baseline studies, including ground investigations. Protection of geology and soil resources during construction, including in relation to the removal, handling, and storage, as well as reinstatement, will be delivered through measures contained in the Outline Environmental Management Plan (OEMP) [APP-187]. The primary mechanism for this protection will be the Soils Management Strategy (SMS) (MW-GEO3), which the main works contractor will be required to produce, and which will identify the nature and types of soil that will be affected and the methods that will be employed for stripping soil and the restoration of agricultural land. In producing the SMS, the contractor shall follow the guidance in Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2009) when handling agricultural soils. Further, as part of the SMS, the contractor will be required to develop a Soils Handling Strategy, with reference with reference to BS3882: 2015 Specification for Topsoil and the Construction Code of Practice for the Sustainable Use of Soils on Construction Site, and a Soil Resource Plan (MW-GEO7). Compliance with the OEMP is secured through paragraph 4 of schedule 2 of the draft DCO</p>	<p>RR-0235, RR-0130, RR-2022, RR-2063, RR-2170</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>[APP-020].</p> <p>Further information on the can be found in ES Chapter 10, Geology and Soils [APP-048], which reports that there will be no significant effects in relation to geology and soils, section 10.9.</p>	
<p>Incomplete information on monitoring and protection of soil stockpiles during the construction process.</p>	<p>Excavated soil, including topsoil, will be managed in accordance with a Soils Handling Strategy and Soils Resource Plan, which will refer to the relevant British Standards, notably BS3882 Specification for topsoil, and will include provision for the sustainable handling, storage and use of topsoil and other soil resources. A requirement for the development of these documents by Highways England's appointed contractor, ahead of construction, has been incorporated into the Outline Environmental Management Plan (OEMP), as set out in Appendix 2.2 of the ES [APP-187], see mitigation measure MW-GE07. Compliance with the OEMP is secured under requirement 4 of Schedule 2 of the draft DCO [APP-020].</p>	<p>RR-2288, RR-2303, RR-2134, RR-2201, RR-2088, RR-2220</p>

11 Heritage and Historic Environment

11.1 Overview

- 11.1.1 A total of 1,979 interested parties raised matters regarding to heritage and historic environment in relation to the scheme in their relevant representations.
- 11.1.2 Table 11-1 provides a summary of the key issues raised in relation to heritage and historic environment, alongside a response from Highways England.

Table 11-1: Heritage and Historic Environment

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
The scheme cannot adversely impact Vespasian's Camp.	Between the eastern tunnel portal and the Countess junction, a combination of re-using the existing dual carriageway, moving the new road to the north of the existing alignment, and providing a cut and cover section of tunnel will mitigate potential impacts on the setting of Vespasian's Camp such that, there would be no permanent adverse effects. During construction, as a result of the construction of the main carriageway and eastern tunnel portal, there would be a slight adverse, and so non-significant, effect on Vespasian's Camp due to aural impact, as reported in ES Appendix 6.8, Table 1.1 [APP-217].	RR-0870, RR-2319
Irreversible damage to archaeology.	The preferred route was carefully chosen to minimise effects on archaeology, and a comprehensive programme of archaeological evaluation surveys has informed the scheme being designed in a way that has limited any direct physical impacts as far as practicable. Examples of how the design has been developed to limit these impacts on archaeology include, but are not limited to, the choice of a northern bypass of Winterbourne Stoke, the reduced footprint and land take for Rollestone Corner, and the design and placement of the western and eastern tunnel portals and portal approaches in areas that have been shown to have limited archaeological remains within their footprint. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044] Section 6.8, Table 6.9. The cultural heritage assessment, reported in ES Chapter 6, identifies the effects on known archaeological features whilst recognising the benefits that the tunnel will deliver for the WHS. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction. The Outline Archaeological Mitigation Strategy	RR-0142, RR-0839, RR-1911, RR-2209, RR-1040

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>(OAMS), Appendix 6.11 of the ES [APP-220] outlines the principles of archaeological mitigation and also identifies areas to be protected in situ. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage), and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020].</p>	
<p>The scheme would be harmful to the integrity and setting of Blick Mead Mesolithic site, Listed buildings at Countess, the Registered Park and Garden of Amesbury Abbey and the Amesbury Conservation Area.</p>	<p>Full details of the cultural heritage assessment in relation to these sites can be found in ES Chapter 6 [APP-044]. The construction of the flyover at Countess will result in a permanent significant adverse effect on the setting of the Grade II-listed buildings at Countess Farm, as set out in paragraph 6.9.26. Impacts will be reduced through planting and provision of noise barriers along the raised section of flyover. There will be permanent non-significant adverse effects arising from changes to the settings of Amesbury Abbey Registered Park and Garden, and Amesbury Conservation Area, paragraph 6.9.19. The scheme will have no adverse effects on Blick Mead, as set out in ES Appendix 6.8, Table 1.2 [APP-217], and ES Appendix 11.4, Annex 3, Blick Mead Tiered Assessment [APP-282].</p>	<p>RR-0009, RR-0637, RR-0743, RR-1504, RR-1621, RR-1918, RR-2146, RR-1954, RR-1536</p>
<p>The scheme would result in unacceptable noise and visual impacts on the WHS, including for OUV and visitors.</p>	<p>The removal of the existing surface road from much of the WHS, once the Scheme has been constructed, will result in significant reductions in traffic noise and visual intrusion. Reductions will also result from the A303 being placed in deep cutting in the western part of the WHS, largely hidden within the wider landscape, and from the Longbarrow junction being moved 600 metres to the west. The reductions in traffic noise are set out in ES Chapter 9 [APP-047], section 9.9, and illustrated in Figure 9.4 [APP-167], and visual intrusion in ES Chapter 7 [APP-045], section 7.9. The constructed Scheme will improve the visitor experience by increasing landscape tranquillity and improving the visual connectivity of the many heritage features within the WHS. Overall, the Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole and the OUV of the WHS would be sustained. Further information can be found in the ES Chapter 6, Cultural Heritage [APP-044] and ES Appendix 6.1, Heritage Impact Assessment [APP-195].</p> <p>There would be temporary impacts during the construction of the Scheme. Construction impacts from noise are set out in ES Chapter 9 [APP-047], section 9.9. Any temporary adverse effects would be limited to those areas in the vicinity of above-ground works and activity. Visual impacts from construction are set out in ES Chapter 7 [APP-045], section 7.9. There would be some</p>	<p>RR-0010, RR-0034, RR-0365, RR-0766, RR-1369, RR-1228, RR-1174, RR-1535, RR-2021</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	temporary adverse effects on receptors within the WHS due to the presence of construction activity. The associated temporary visual and aural construction impacts on Asset Groups within the WHS are set out in ES Chapter 6, Cultural Heritage, section 6.9 and Table 6.10.	
The scheme would result in unacceptable impacts on our national heritage.	The removal of the existing A303 surface road from the WHS landscape will result in extensive benefits for the WHS, including significant reductions in traffic noise, as set out in ES Chapter 9 [APP-047], Section 9.9, and illustrated in Figure 9.4 [APP-167], and reduction of visual intrusion, as set out in ES Chapter 7 [APP-045], Section 7.9. The cultural heritage assessment for the scheme can be found in the ES, Chapter 6 [APP-044], Section 6.9. Detailed consideration of the assessment of the scheme in the context of the OUV of the WHS can be found in ES Appendix 6.1, Heritage Impact Assessment (HIA) [APP-195]. The scheme has avoided direct physical impacts on scheduled monuments and listed buildings as summarised in ES Appendix 6.1, HIA. Overall, the Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole. This takes into account that of the seven attributes of OUV for the WHS, whilst the scheme will have a slight adverse effect on two of those attributes, it will have a beneficial effect on the remaining five (being a slight beneficial effect on 3 of the attributes, a large beneficial effect on one, and a very large beneficial effect on one). This conclusion also takes into account that the scheme will have a slight beneficial effect on the authenticity and integrity of the WHS. Overall, the OUV of the WHS would be sustained.	For a list of all RR that raised this issue, please see Appendix H.
The eastern tunnel portal would result in adverse impacts on Scheduled Monuments, including the Stonehenge Avenue and Vespasian's Camp, and the enjoyment of walkers in this area.	Full details of the cultural heritage assessment in this area can be found in ES Chapter 6 [APP-044]. The scheme has avoided direct physical impacts on scheduled monuments. The positioning of the eastern tunnel portal will allow the re-connection of The Avenue, where it is currently severed by the existing A303, resulting in a permanent large beneficial effect, as reported in ES Chapter 6, Table 6.11. This will result in a positive rather than negative effect, as described in Section 6.9. Between the eastern tunnel portal and the Countess junction, a combination of re-using the existing dual carriageway, moving the new road to the north of the existing alignment, and providing a cut and cover section of tunnel will mitigate potential impacts on the setting of Vespasian's Camp such that there would be no permanent adverse effects. During construction, as a result of the construction of the main carriageway and eastern tunnel portal, there would be a slight adverse, and so non-significant, effect on Vespasian's Camp due to aural impact, as reported in ES Appendix 6.8, Table 1.1. Walkers in the area will be able to enjoy a new right of way from Amesbury across the WHS, whereas currently they would have to walk across the busy A303.	RR-0021, RR-0323, RR-0870, RR-1246, RR-1911, RR-1681, RR-2313

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Concerned about the plans to deposit 1.5 million cubic metres of spoil alongside the WHS.	There are no plans to deposit material from the tunnel alongside the WHS. Instead the material will be used to provide landscape and environmental mitigation on land to the east of Parsonage Down. This is approximately 2.5 km from the western boundary of the WHS and hidden from view within the natural topography of the landscape, and so will not have any adverse effects on the WHS.	RR-1055
What will happen if there is a major archaeological find during construction?	There will be a full comprehensive programme of archaeological mitigation works in advance of construction such that parts of the development, where there is a risk of locating archaeological remains, are archaeologically mitigated before construction works commence. The principles of archaeological mitigation are outlined in Appendix 6.11 of the ES, Outline Archaeological Mitigation Strategy [APP-220], which has been informed by a comprehensive programme of archaeological evaluation. A Detailed Archaeology Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020]. The Highways England contractor will be required to develop a Heritage Management Plan, which will include procedures for unexpected archaeological finds during construction.	RR-0019, RR-1278, RR-1060, RR-1683, RR-1708, RR-1701, RR-2078, RR-2209
The heritage assessment is not correct, it misunderstands OUV and the importance of the WHS.	A comprehensive Heritage Impact Assessment has been prepared following ICOMOS guidelines (https://www.icomos.org/world_heritage/HIA_20110201.pdf). The scope and approach of this assessment, which is reported in ES Appendix 6.1 [APP-195], was endorsed by UNESCO/ICOMOS in their report from their third advisory mission on the scheme early in 2018 (https://whc.unesco.org/en/list/373/documents/). The Applicant considers that the HIA has been carried out accurately and with a full appreciation and understanding of the importance of the WHS and its OUV. Full details of the engagement with ICOMOS can be found in the Consultation Report [APP-026], Chapters 2 and 3.	RR-0072, RR-1504, RR-1621, RR-1898, RR-1721, RR-2288, RR-2303, RR-2264, RR-2134, RR-2057, RR-1584, RR-2201, RR-2088, RR-2220
The scheme should give equal consideration to archaeology outside of the WHS as within.	The scheme carefully considers both the archaeology outside and within the WHS. The preferred route for the Scheme was selected to avoid known archaeological remains. Subsequent design development has been informed by a comprehensive programme of archaeological evaluation surveys across the full scheme footprint and to avoid significant archaeological remains wherever practicable. The approach and the results are reported in ES Chapter 6, Cultural Heritage [APP-044].	RR-0475, RR-0610
The scheme would damage	The full heritage assessment results are reported in ES Chapter 6, Cultural Heritage [APP-044]	RR-0183, RR-0575,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
the integrity of the Normanton Down barrow group and other Scheduled Monuments, including the Wilsford Shaft.	and the Heritage Impact Assessment, ES Appendix 6.1 [APP-195], including impacts and the resulting effects on scheduled monuments. The HIA reports a slight adverse effect on the Wilsford Shaft, but, with regards to Normanton Down Barrow Group, overall, the HIA reports a permanent moderate beneficial effect.	RR-0839, RR-1504, RR-1911, RR-1838, RR-1971, RR-2063, RR-1681, RR-2288, RR-2329
Will archaeologists be involved in the project every step of the way, including throughout construction?	Yes. Archaeologists have been involved with the Scheme throughout every step of its development and will continue to be involved throughout construction; their advice has been to the fore in influencing the choice of route and the Scheme's design. Additionally, Highways England has engaged regularly with key heritage stakeholders, including through the Heritage Monitoring Advisory Group (HMAG; which includes Wiltshire County Archaeology Services (WCAS), Historic England, National Trust, and English Heritage), and the Scientific Committee of eminent archaeological experts. Their involvement will continue up to and through construction and is secured as part of a Detailed Archaeology Mitigation Strategy (DAMS), which is being developed in consultation with WCAS and the HMAG and which is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020]. More information on engagement with archaeological and other heritage experts, including the parties of the Heritage Monitoring Advisory Group (HMAG), and the Scientific Committee of eminent archaeological experts, can be found in the ES Chapter 6, Cultural Heritage [APP-044] and the Consultation Report [APP-026].	RR-0180, RR-0096, RR-0413, RR-0412, RR-1801
The proposed scheme will result in adverse outcomes on the attributes of the Outstanding Universal value (OUV) and could lead to the loss of the UNESCO designated WHS status.	The removal of the existing A303 surface road from the WHS landscape will result in extensive benefits for the WHS, including significant reductions in traffic noise, as set out in ES Chapter 9 [APP-047], Section 9.9, and illustrated in Figure 9.4 [APP-167], and significant reductions in visual intrusion, as set out in ES Chapter 7 [APP-045], Section 7.9, with the removal of much of the existing A303 surface route, which has a major adverse impact currently on the OUV of the WHS; its removal being an objective of the WHS Management Plan 2015. The cultural heritage assessment for the scheme can be found in the ES, Chapter 6 [APP-044] and the assessment of the impact of the scheme on the OUV of the WHS is in the Heritage Impact Assessment (HIA) at Appendix 6.1 to the ES [APP-195]. The HIA concludes that overall, the Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole. This takes into account that of the seven attributes of OUV for the WHS, whilst the scheme will have a slight adverse effect on two of those attributes, it will have a beneficial effect on the remaining five (being a slight beneficial effect on 3 of the attributes, a large beneficial effect on one, and a very large beneficial	RR-0017, RR-0001, RR-0009, RR-0031, RR-0116, RR-0120, RR-0263, RR-0098, RR-0360, RR-0653, RR-0802, RR-0830, RR-0839, RR-0815, RR-1211, RR-1334, RR-0963, RR-1014, RR-1054, RR-0882, RR-1598, RR-1731, RR-1712, RR-1715, RR-1898, RR-1699,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>effect on one). This conclusion also takes into account that the scheme will have a slight beneficial effect on the authenticity and integrity of the WHS. The OUV of the WHS would be sustained. This is set out in Section 12.4 of the HIA. The impact of the scheme in terms of the inscription of the WHS is assessed in Section 12.5 of the HIA and concludes that the Scheme would not impact upon the continuing relevance and application of the WHS inscription criteria. There is therefore no indication of there being any risk to the site's world heritage status, and overall the Scheme results in benefits for the WHS.</p>	<p>RR-0154, RR-1654, RR-1878, RR-1732, RR-1693, RR-1722, RR-1778, RR-1875, RR-1782, RR-1765, RR-1754, RR-2260, RR-1681, RR-2288, RR-2303, RR-1976, RR-2044, RR-2042, RR-2005, RR-2298, RR-2134, RR-2038, RR-2052, RR-2048, RR-2047, RR-2370, RR-2008, RR-1896, RR-2201, RR-2088, RR-2220</p>
<p>What will be the process for mitigating the archaeology impacts ahead of construction?</p>	<p>The principles of archaeological mitigation are outlined in Appendix 6.11 of the ES, Outline Archaeological Mitigation Strategy (OAMS) [APP-220], which has been informed by a comprehensive programme of archaeological evaluation. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction. The OAMS also identifies areas to be protected in-situ. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage), and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020].</p>	<p>RR-1504, RR-1060, RR-1621, RR-1683, RR-1879, RR-1583</p>
<p>Can the preferred route, in any form, avoid damaging archaeology?</p>	<p>The preferred route for the Scheme was selected to avoid known archaeological remains, important sites and monuments. Subsequent design development has been informed by a comprehensive programme of archaeological evaluation surveys. Examples of how the design has been developed to limit direct impacts on archaeology include the choice of a northern bypass of Winterbourne Stoke, the reduced footprint and land take for Rollestone Corner, and the design and placement of the western and eastern tunnel portals and approaches in areas that have been shown to have limited archaeological remains within their footprint. Further</p>	<p>RR-0786, RR-0839, RR-1013</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage), and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020].</p>	
<p>The proposals for the western tunnel approach cutting are unacceptable as the monuments and archaeology there are genuinely unique, just as important as Stonehenge itself. This site must be protected.</p>	<p>Impacts on monuments and monument groups (Asset Groups) in this part of the WHS are considered in ES Chapter 6, Cultural Heritage [APP-044] and the Heritage Impact Assessment (ES Chapter 6, Cultural Heritage, Appendix 6.1) [APP-195]. The preferred route for the Scheme was selected to avoid known archaeological remains, important sites and monuments. Subsequent design development at the western tunnel approach, including mitigation measures to limit or avoid impacts, has been informed by a comprehensive programme of archaeological evaluation surveys, which have confirmed the limited nature of the archaeological remains within the construction footprint for the Western Portal and its approach cutting. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] identifies areas to be protected in-situ. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage), and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020].</p>	<p>RR-0291, RR-0932, RR-1911, RR-2063, RR-1681, RR-2025, RR-2209, RR-2042, RR-2075, RR-1040</p>
<p>It is dangerous to plan on the basis that what we know now of the ancient landscape is all that exists in the ancient landscape.</p>	<p>The preferred route was carefully chosen to avoid known archaeological remains. A comprehensive programme of archaeological evaluation surveys (see ES Chapter 6 Cultural Heritage, paragraphs 6.6.13 – 6.6.52), covering the entire red line boundary of the scheme, has informed the scheme being designed in a way that has limited archaeological impacts where this is practicable. Examples of how the design has been developed to limit impacts on archaeology include the choice of a northern bypass of Winterbourne Stoke, the reduced footprint and land take for Rollestone Corner, and the design and placement of the western and eastern tunnel</p>	<p>For a list of all RR that have raised this issue, please see Appendix H.</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>portals and approaches in areas that have been shown to have limited archaeological remains within their footprint. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction, to avoid, as far as is practicable, previously unknown archaeological remains being uncovered during construction. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] also identifies areas to be protected in-situ. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage), and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020]. The archaeological results and the archive of finds and reports would be available for study in the future, enabling knowledge of the ancient landscape to be re-evaluated as knowledge of our past and scientific techniques evolve.</p>	
<p>To date there have not been sufficient archaeological investigations in the western section of the WHS. The results of the evaluation may prove to be a significant constraint to the project.</p>	<p>Comprehensive archaeological evaluation surveys have been undertaken in the western section of the WHS (as set out in ES Chapter 6, Cultural Heritage [APP-044], paragraphs 6.6.25 – 6.6.3) which confirm that the route will be acceptable in this location. The preferred route for the Scheme was selected to avoid known archaeological remains, important sites and monuments. Subsequent design development in the western section of the WHS has been informed by the comprehensive programme of archaeological evaluation surveys. Examples of how the design has been developed to limit archaeological impacts include the choice of a northern bypass of Winterbourne Stoke, the reduced footprint and land take for Rollestone Corner, and the design and placement of the western tunnel portal and approaches in areas that have been shown from the comprehensive archaeological evaluations to have limited archaeological remains within their footprint. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction, in order to avoid, as far as is practicable, previously unknown archaeological remains being uncovered during construction. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] identifies areas to be protected in-situ.</p>	<p>RR-1030, RR-1621, RR-1898, RR-2277, RR-1947</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>Detailed mapping and modelling is required to demonstrate the exact nature of intervisibility with components of OUV and to inform an appropriate design to mitigate this.</p>	<p>Design development has benefited from extensive mapping and modelling, to inform both the Landscape and Visual Impact Assessment and the Heritage Impact Assessment (ES Chapter 6, Cultural Heritage, Appendix 6.1, paragraph 5.2.10). The interpretation of OUV and the scope and approach of the assessment, which is reported in ES Appendix 6.1, Heritage Impact Assessment [APP-195] (HIA), was endorsed by UNESCO/ICOMOS in their report from their third advisory mission on the scheme in early 2018. Further, the HIA also included extensive site-based walkover surveys to verify and ground truth the inter-relationships and inter-visibility between monuments and monument groups that contribute to the OUV of the WHS, as set out in 5.3 of the HIA.</p>	<p>RR-2329</p>
<p>There seems to be no consideration of the potential for Palaeolithic remains. There should be an assessment of the potential for Palaeolithic remains to be present.</p>	<p>The potential for Palaeolithic remains to be encountered is considered in the ES Appendix 6.2, Archaeological Baseline, Section 3.2 [APP-211]. In general, evidence relating to the Palaeolithic period is scarce in this area. Only a very small number of Palaeolithic artefacts have been recorded in this part of south Wiltshire, and the provenance (source) of these is often poorly recorded. Although Pleistocene deposits (dating from the last ice age) associated with the River Avon and the River Till could feasibly contain artefactual evidence for early hominin occupation, any such evidence is unlikely to include in-situ Palaeolithic remains.</p>	<p>RR-1686</p>
<p>To date there have not been sufficient archaeological investigations in the eastern section of the WHS. The results of the evaluation may prove to be a significant constraint to the project.</p>	<p>Comprehensive archaeological evaluation surveys have been undertaken in the eastern section of the WHS (see ES Chapter 6 Cultural Heritage, paragraphs 6.6.18 – 6.6.24) confirming that the route will be acceptable in this location. The preferred route for the Scheme was selected to avoid known archaeological remains, important sites and monuments. Subsequent design development in the eastern section of the WHS has been informed by a comprehensive programme of archaeological evaluation surveys and ongoing engagement with key heritage stakeholders. Examples of how the design has been developed to limit direct physical impacts on archaeology include the design and placement of the eastern portal and approach in areas that have been shown to have limited archaeological remains within their footprint. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction, in order to avoid, as far as is practicable, previously unknown archaeological remains being uncovered during construction. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] identifies areas to be protected in-situ.</p>	<p>RR-1621, RR-1898, RR-1947</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>The proposed Scheme does not meet its key objective to "<i>help conserve and enhance the World Heritage Site and make it easier to reach and explore</i>".</p>	<p>The removal of the existing A303 surface road from a large part of the WHS landscape will result in extensive benefits for the WHS, including significant reductions in (a) traffic noise, as set out in ES Chapter 9 [APP-047], Section 9.9, and illustrated in Figure 9.4 [APP-167], and (b) visual intrusion, as set out in ES Chapter 7 [APP-045], Section 7.9, as well as greatly increased NMU route connectivity between and through the currently severed halves of the WHS. The removal of congestion from the A303 will also make it much easier for visitors to travel to and from the WHS. The HIA (ES Appendix 6.1) [APP-195] concludes that overall, the Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole. This takes into account that of the seven attributes of OUV for the WHS, whilst the scheme will have a slight adverse effect on two of those attributes, it will have a beneficial effect on the remaining five (being a slight beneficial effect on 3 of the attributes, a large beneficial effect on one, and a very large beneficial effect on one). This conclusion also takes into account that the scheme will have a slight beneficial effect on the authenticity and integrity of the WHS. The OUV of the WHS would be sustained as set out in Section 12.4 of the HIA. As a result of all the measures it contains, the Scheme will meet its objective to conserve and enhance the WHS and make it easier to reach and explore.</p>	<p>RR-0695, RR-1397, RR-1100, RR-1621, RR-1732, RR-1844, RR-1785, RR-2079, RR-1963</p>
<p>The Scheme should improve connectivity into and through the WHS for visitors, improving the visitor experience.</p>	<p>The Scheme will improve the visitor experience by transforming the WHS landscape around Stonehenge. Connectivity into and through the WHS will be improved through the provision of new and enhanced public rights of way, notably the new route on the line of the old A303, linking Winterbourne Stoke with Amesbury via the WHS. Changes to existing, or creation of new, public rights of way are secured by the development consent order [APP-020], and are shown on the Rights of Way and Access Plans [APP-009].</p>	<p>RR-0766, RR-0873</p>
<p>You're not allowed to build in the WHS.</p>	<p>Development within a World Heritage Site is not prohibited, however, there are various measures in place to ensure the protection of a WHS. The Heritage Impact Assessment (HIA), ES Appendix 6.1 [APP-195], has been undertaken with due regard for the World Heritage Convention, the principal global instrument for the protection of cultural and natural heritage. Further, the Examining Authority (on behalf of the Secretary of State), through the DCO process, will examine the scheme against national and local policies (which include policies for the protection of WHS), including the National Policy Statement for National Networks (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/387222/npsnn-print.pdf), compliance with which is set out in the Case for the Scheme and NPS Accordance [APP-294]. The Planning Inspectorate will provide a recommendation following</p>	<p>RR-0216, RR-0418, RR-0534, RR-0548, RR-1183, RR-1182, RR-1190, RR-0933, RR-0990, RR-2258, RR-1817, RR-2257</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	the public examination to the Secretary of State, with whom the ultimate decision on whether to grant the development consent order sits.	
The opinion that Stonehenge should " <i>stand alone</i> " in its environment is obsolete, the tunnel is based on old thinking.	The benefits of the Scheme associated with removal of the sight and sound of traffic from a large part of the WHS, the opportunity for reconnection of The Avenue, and the provision of a c.150 metre green bridge, are considered in the context of the whole WHS and the many scheduled monuments within it, not just the Stonehenge monument. The Heritage Impact Assessment, as set out in ES Appendix 6.1 [APP-044], Section 12.4, concludes that the scheme will deliver significant beneficial effects for the setting of many scheduled monuments within the WHS, as well as Stonehenge, whilst sustaining the OUV of the WHS. The removal of the A303 from the WHS has been a long-standing aspiration and commitment for the WHS since its inscription in 1986 and through successive WHS Management Plans, including the latest Management Plan for the WHS published in 2015.	RR-0021, RR-0604, RR-0769, RR-1393, RR-1514, RR-0970, RR-1835, RR-1887, RR-2079, RR-2327
The precise route of the tunnel will not impact on archaeology, is that correct?	The 2-mile long bored tunnel itself is designed to preserve archaeological remains. In overall terms, the preferred route was selected to avoid known archaeological remains, important sites and monuments, and a comprehensive programme of archaeological evaluation surveys has informed the Scheme being designed in a way that has limited archaeological impacts as far as is practicable. Further information can be found in ES Chapter 6, Cultural Heritage [APP-044], Paragraph 6.8.2.	RR-0013
How will the archaeological finds be managed and stored after excavation?	The response to any archaeological finds will range from protection in-situ to depositing the finds with a suitable local museum for long-term storage, curation and display. Initial discussions have been held with the Salisbury and South Wiltshire Museum to this effect. The finds and records will be retained in appropriate storage facilities until an agreement with a suitable local museum is concluded. For excavated finds, a post-excavation assessment would be undertaken, and post-excavation works are likely to be presented in appropriate publications. Further detail is provided in Section 4.3 of the Outline Archaeological Mitigation Strategy (OAMS) [APP-220]. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage), and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020].	RR-0019, RR-0839
The tunnel passes directly underneath the circle meaning	The tunnel does not pass directly beneath Stonehenge. At its closest point, the tunnel will pass c.200 metres to the south of Stonehenge, farther away than the existing A303. The 2 mile long	RR-0152, RR-0284, RR-0552, RR-0431,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
ground will be disturbed and archaeology lost.	bored tunnel itself is designed to preserve archaeological remains. Further information can be found in ES Chapter 6, Cultural Heritage [APP-044].	RR-1381, RR-1504, RR-1608, RR-2315
It is highly likely that the scheme will disturb Ancestors (what you call buried remains). Ancestors should be treated with the upmost respect. How will you ensure they are respected?	If any human remains are encountered that need to be removed, this will be done in accordance with Article 16 of the development consent order [APP-020], which sets out provisions to be followed for the removal of human remains. The work will be undertaken by archaeological specialists, with the respect due to the treatment of human remains, in accordance with current good practice and archaeological standards and guidance.	RR-0323, RR-0040, RR-0781, RR-1288, RR-1039, RR-1064, RR-1118, RR-0870, RR-1559, RR-1662, RR-1830, RR-1983, RR-2249, RR-2316
The proposal fails to take into consideration the known archaeology. A full assessment into the potential archaeology hasn't been carried out.	The preferred route for the Scheme was selected to avoid known archaeological remains, important sites and monuments. Subsequent design development has been informed by a comprehensive programme of archaeological evaluation surveys across the full red line boundary for the scheme. Examples of how the design has been developed to limit direct impacts on archaeology include the choice of a northern bypass of Winterbourne Stoke, the reduced footprint and land take for Rolleston Corner, and the design and placement of the western and eastern tunnel portals and approaches in areas that have been shown to have limited archaeological remains within their footprint. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction in order to avoid, as far as is practicable, previously unknown archaeological remains being uncovered during construction. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] identifies areas to be protected in-situ. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage), and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020].	RR-0897, RR-1013, RR-2146, RR-2264
Concerned about the potential for impacts on the Avebury half of the WHS.	Given the distance of the works from the Avebury element of the WHS (40km), the Scheme will have no direct physical impacts on it. In terms of in-direct impacts, it is pertinent to note that the characteristics of visitors to Stonehenge and Avebury are distinct; those visiting Stonehenge are often either from the international market, visiting iconic tourist attractions, or part of an organised tour; those visiting Avebury are often more dedicated, in-country visitors interested in	R-0861, RR-1567, RR-2268, RR-2329, RR-1896

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>the prehistoric period and its monuments. As the existing A303 will remain open throughout construction, and because of the different nature of visitor each site attracts, it is not anticipated that visitors and tour operators will change their tour schedule to visit Avebury rather than Stonehenge during construction, or following scheme opening and in the operational phase. It is therefore expected that the construction or operation of the Scheme will not have an in-direct impact on Avebury.</p>	
<p>Concern about damage to archaeology within the WHS.</p>	<p>The preferred route for the Scheme was selected to minimise effects on archaeology and to avoid known archaeological remains, important sites and monuments. A comprehensive programme of archaeological evaluation surveys (see ES Chapter 6 Cultural Heritage, paragraphs 6.6.13 – 6.6.52) has informed the scheme being designed in a way that has limited archaeological impacts as far as practicable, including within the WHS. Examples of how the design has been developed to limit direct impacts on archaeology include the reduced footprint and land take for Rollestone Corner, and the design and placement of the western and eastern tunnel portals and approaches within the WHS in areas that have been shown to have limited archaeological remains within their footprint. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction in order to avoid, as far as is practicable, previously unknown archaeological remains being uncovered during construction. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] identifies areas to be protected in-situ. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage), and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020].</p>	<p>RR-0234, RR-0096, RR-0103, RR-0348, RR-0434, RR-0436, RR-0650, RR-0698, RR-0817, RR-0839, RR-1220, RR-0876, RR-1156, RR-1225, RR-1209, RR-1504, RR-1511, RR-1029, RR-1024, RR-1017, RR-1609, RR-1555, RR-1731, RR-1736, RR-1898, RR-1837, RR-1879, RR-1754, RR-1688, RR-2069, RR-2305, RR-2078, RR-2021, RR-1911</p>
<p>Ensure that all ICOMOS / UNESCO recommendations are met so that World Heritage status for Avebury is neither withdrawn nor the Site is put on the 'Sites in Danger' list.</p>	<p>The recommendations of the UNESCO/ICOMOS missions carried out in 2015, 2017 and 2018 and the subsequent decisions of the World Heritage Committee have been considered carefully and integrated into the Scheme's design where practicable. The UNESCO/ICOMOS recommendations and World Heritage Committee decisions have informed the development of the Scheme and its design responds to these including: the route alignment selected as the preferred route avoiding the winter solstice sunset alignment and the bisecting of the Diamond Group; setting the road in deep retained cuttings to minimise landtake; determining the length of</p>	<p>RR-0658, RR-1336, RR-1567, RR-2036, RR-219, RR-2075</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>the tunnel to avoid the Scheduled Monument known as the Avenue (NHLE 1010140) at its eastern end and a Bowl barrow south of the A303 and north west of Normanton Gorse (NHLE 1010832) at its western end – the tunnel length has been extended to 2 miles (or 3km) in length; the further addition of 200m of canopy at the western portal and 85m of canopy at the eastern portal to further extend the tunnel (to almost 3.3km) to aid landscape integration; the optimization of the positions of the tunnel portals at the head of dry valleys in the landscape; in order to reduce the length of cutting (and minimise the length of the culvert part of the tunnel in the western approaches) the addition of the 150m long land bridge to maintain physical and visual connectivity between the Winterbourne Stoke Crossroads Barrows and the Diamond Group; the removal of the surface A303 into a tunnel and approach cuttings to reduce noise and improve the tranquillity of the WHS; in order to minimise light spill measures have included no lighting of the new Longbarrow Junction or the approach cuttings, new directional lighting at Countess Junction replacing the existing non-directional lighting, lighting of the portals would be designed to minimise light spill out in to the WHS landscape and lighting under the land bridge will only operate during daylight hours; and to minimise the visibility of new infrastructure within the WHS signage and other highways installations will sit completely within the approach cuttings and not extend above them. Further information on the missions, including how Highways England has considered the recommendations of UNESCO/ ICOMOS can be found in the Consultation Report [APP-026], Chapters 2 and 3.</p> <p>Engagement with the World Heritage Centre will continue through the detailed design and construction of the Scheme. There has been no indication that the site's World Heritage status is at risk. In addition, the impact of the Scheme in terms of the inscription of the WHS has been assessed in Section 12.5 of the HIA, Appendix 6.1 to the ES, [APP-195] and concluded that the Scheme would not impact upon the continuing relevance and application of the WHS inscription criteria.</p>	
Comply with ICOMOS Wishes.	The recommendations of the UNESCO/ICOMOS missions carried out in 2015, 2017 and 2018 and the subsequent decisions of the World Heritage Committee have been considered carefully and integrated into the Scheme's design where practicable. The UNESCO/ICOMOS recommendations and World Heritage Committee decisions have informed the development of the Scheme and its design responds to these including: the route alignment selected as the preferred route avoiding the winter solstice sunset alignment and the bisecting of the Diamond	RR-0021, RR-1504, RR-1398, RR-1754, RR-2078, RR-1947

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>Group; setting the road in deep retained cuttings to minimise landtake; determining the length of the tunnel to avoid the Scheduled Monument known as the Avenue (NHLE 1010140) at its eastern end and a Bowl barrow south of the A303 and north west of Normanton Gorse (NHLE 1010832) at its western end – the tunnel length has been extended to 2 miles (or 3km) in length; the further addition of 200m of canopy at the western portal and 85m of canopy at the eastern portal to further extend the tunnel (to almost 3.3km) to aid landscape integration; the optimization of the positions of the tunnel portals at the head of dry valleys in the landscape; in order to reduce the length of cutting (and minimise the length of the culvert part of the tunnel in the western approaches) the addition of the 150m long land bridge to maintain physical and visual connectivity between the Winterbourne Stoke Crossroads Barrows and the Diamond Group; the removal of the surface A303 into a tunnel and approach cuttings to reduce noise and improve the tranquillity of the WHS; in order to minimise light spill measures have included no lighting of the new Longbarrow Junction or the approach cuttings, new directional lighting at Countess Junction replacing the existing non-directional lighting, lighting of the portals would be designed to minimise light spill out in to the WHS landscape and lighting under the land bridge will only operate during daylight hours; and to minimise the visibility of new infrastructure within the WHS signage and other highways installations will sit completely within the approach cuttings and not extend above them. Further information on the missions, including how Highways England has considered the recommendations of UNESCO/ ICOMOS can be found in the Consultation Report [APP-026], Chapters 2 and 3.</p> <p>The Scheme design submitted for development consent has evolved substantially since the last UNESCO/ICOMOS mission was carried out in early 2018 and following submission of the DCO, UNESCO has been notified of the application. It is expected that The State of Conservation Report (SOCR) prepared by the Department for Digital, Culture, Media & Sport and submitted to UNESCO in February 2019 (see - https://whc.unesco.org/en/list/373/documents/), will be considered at the next meeting of UNESCO's World Heritage Committee, scheduled for summer 2019.</p>	
<p>This is a spiritual place with amazing energy. Why is it being damaged?</p>	<p>The removal of the existing A303 surface road from a large part of the WHS landscape will result in extensive benefits for the WHS, including significant reductions in (a) traffic noise, as set out in ES Chapter 9 [APP-047], Section 9.9, and illustrated in Figure 9.4 [APP-167], and (b) visual intrusion, as set out in ES Chapter 7 [APP-045], Section 7.9. The cultural heritage assessment</p>	<p>RR-0020, RR-0107, RR-0432, RR-0620, RR-0508, RR-0638, RR-0679, RR-0706,</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>for the Scheme can be found in the ES, Chapter 6 [APP-044]. The Heritage Impact Assessment (HIA) (ES Appendix 6.1, [APP-195]) concludes that the Scheme will have an overall slight beneficial effect on the WHS and will sustain its OUV, as set out in Section 12.4. The scheme is being pursued to address the congestion on the A303 which itself is currently damaging to the Outstanding Universal Value of the WHS; reducing the damaging effects of the A303 on the WHS has been a long-standing aspiration and commitment for the WHS since its inscription in 1986 and through successive WHS Management Plans, including the latest Management Plan for the WHS published in 2015. Placing the A303 in a 2-mile long tunnel will transform and enhance the WHS landscape in that area. The Scheme will improve the visitor experience by transforming the WHS landscape in that area and reconnecting the two halves of the WHS, which are currently severed by the surface road. Connectivity into and through the WHS will be improved through the placement of the road in bored tunnel and the provision of new and enhanced public rights of way across the landscape, notably the new byway on the line of the old A303, linking Winterbourne Stoke with Amesbury via the WHS.</p>	<p>RR-0713, RR-0828, RR-0813, RR-0848, RR-0847, RR-1173, RR-1474, RR-1490, RR-1037, RR-1821, RR-1795, RR-1983, RR-2262, RR-2163, RR-1941</p>
<p>Negative impact of the scheme on archaeology and WHS.</p>	<p>The preferred route for the Scheme was selected to minimise effects on archaeology and to avoid known archaeological remains, important sites and monuments. A comprehensive programme of archaeological evaluation surveys has informed the scheme being designed in a way that has limited any direct physical impacts as far as practicable, including within the WHS. Examples of how the design has been developed to limit direct impacts on archaeology include the reduced footprint and land take for Rollestone Corner, and the design and placement of the western and eastern tunnel portals and approaches within the WHS in areas that have been shown to have limited archaeological remains within their footprint. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] identifies areas to be protected in-situ. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage), and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020]. The Heritage Impact Assessment (HIA), as set out in ES Appendix 6.1, HIA [APP-195], considers the implications of the scheme in the context of the protection of OUV and the Authenticity and Integrity of the WHS. The HIA concludes that overall, the Scheme is assessed</p>	<p>RR-0334, RR-0625, RR-0784, RR-0838, RR-0860, RR-1879, RR-2339</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	to have a Slight Beneficial effect on the OUV of the WHS as a whole. This takes into account that of the seven attributes of OUV for the WHS, whilst the scheme will have a slight adverse effect on two of those attributes, it will have a beneficial effect on the remaining five (being a slight beneficial effect on 3 of the attributes, a large beneficial effect on one, and a very large beneficial effect on one). This conclusion also takes into account that the scheme will have a slight beneficial effect on the authenticity and integrity of the WHS. The OUV of the WHS would be sustained as set out in Section 12 of the HIA.	
Concerns regarding interference with ley lines.	There is much debate as to whether these energy lines exist or not, in fact the term ley line was coined in the early 1920s by Alfred Watkins, a landscape photographer and amateur archaeologist, who noticed that ancient sites seemed to be aligned with others nearby, his idea being that our ancestors built and used prominent features in the landscape as navigation points and that these lines in the landscape connecting ancient sites and natural features represented old trackways or routes that were followed in prehistoric times. This original idea has subsequently been developed by others and investigated by bodies such as the British Society of Dowsers. Many archaeological surveys have been undertaken over the years on the landscape of Stonehenge and, with specific reference to this scheme, Highways England and their consultants have comprehensively covered the full red line boundary with detailed non-intrusive geophysical surveys which have the ability to identify buried archaeological and geological features, as well as power cables and other utility cables buried in the ground. These surveys have not identified any such energy lines or ley lines in the landscape.	RR-0071, RR-0584, RR-0683, RR-0691, RR-0783, RR-0848, RR-1464, RR-1062, RR-0863, RR-1880, RR-1793, RR-1719
Consideration should be given to fully re-connecting the Stonehenge Avenue. The possibility of reaching Amesbury by a footpath along the river via existing footpaths should be explored. This would link the Bluehenge site to Stonehenge.	The scheme will facilitate the reconnection of The Avenue where it is currently severed by the existing A303. Further reconnection and making it fully accessible falls outside the scope of the scheme. Highways England is working with the relevant stakeholders to identify opportunities for legacy benefits, such as improving footpaths along the river, to be pursued by other means.	RR-1728
The protection of OUV and the Authenticity and Integrity of the WHS are key	Agreed. The Heritage Impact Assessment (HIA), as set out in ES Appendix 6.1, HIA [APP-195], considers the implications of the Scheme in the context of the OUV and the Authenticity and Integrity of the WHS. The HIA concludes that overall, the Scheme is assessed to have a Slight	RR-0084, RR-1610, RR-1622, RR-1834, RR-1785, RR-2288,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>considerations in assessing proposals within the site or its setting.</p>	<p>Beneficial effect on the OUV of the WHS as a whole. The OUV of the WHS would be sustained as set out in Section 12.4 of the HIA.</p>	<p>RR-2303, RR-2134, RR-2201, RR-2088, RR-2220</p>
<p>The western section of the proposed scheme within the WHS has the potential to impact adversely upon the WHS and its OUV unless very carefully and sensitively designed.</p>	<p>The preferred route for the Scheme was selected to sustain OUV, by avoiding known archaeological remains, important sites and monuments that contribute to the OUV of the WHS. Subsequent careful and sensitive design development, including mitigation measures to limit or avoid impacts, has been informed by a Heritage Impact Assessment, as set out in ES Appendix 6.1, HIA [APP-195]. This has informed the choice of options for the cutting approach to the tunnel and canopy design over the tunnel entrance in the western part of the WHS, as well as the positioning of a c.150 metre wide green bridge near Longbarrow. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9. The removal of the existing A303 surface road from the WHS landscape will result in extensive benefits for the WHS, including significant reductions in traffic noise, as set out in ES Chapter 9 [APP-047], Section 9.9, and illustrated in Figure 9.4 [APP-167], and visual intrusion, as set out in ES Chapter 7 [APP-045], Section 7.9. The HIA concludes that overall, the Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole. The OUV of the WHS would be sustained. This is set out in Section 12.4.</p>	<p>RR-0481, RR-1053, RR-1879, RR-1681, RR-2329</p>
<p>It may be that the Blick Mead site is dependent in part on the maintenance of groundwater levels within the site. An appropriate assessment (see recent Historic England guidance) will be important in identifying any sensitivities and designing effective mitigation.</p>	<p>The scheme's potential impacts on groundwater levels and flows have been assessed and the assessment has shown that there will not be any adverse effect on groundwater levels at Blick Mead, or the preservation of its archaeological remains. Further information can be found in ES Chapter 11, Appendix 4, Annex 3, Blick Mead Tiered Assessment [APP-282], which was completed in accordance with Historic England's guidance. However, given the interest in the site, both from members of the public and heritage bodies, hydrological monitoring at Blick Mead is continuing and includes monitoring of water levels and springs at shallow depths.</p>	<p>RR-1451, RR-1504, RR-1681, RR-2355</p>
<p>A substantial programme of archaeological evaluation is required to allow us to understand the direct impacts of the proposed scheme. This</p>	<p>A comprehensive programme of archaeological evaluations, the scope of which was agreed with the Heritage Monitoring Advisory Group (HMAG) and endorsed by the Scientific Committee, has been completed within the scheme red line boundary, which includes land to be acquired temporarily and permanently, both within and outside of the WHS. The cultural heritage assessment, reported in Chapter 6 of the ES [APP-044], provides detail of the archaeological</p>	<p>RR-1504, RR-1879, RR-2356, RR-2075</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
includes all areas within the red line boundary and land affected by temporary infrastructure.	evaluation surveys and assessments that have been undertaken to inform the design of the scheme and on which the cultural heritage assessment is based.	
Where archaeological excavation is required, it is important the project commits to a full and timely programme of post-excavation analysis, archive preparation and appropriate publication. Funding must be available for the full publication of results in a suitable and appropriate format. There should also be adequate resources made available for the long-term storage of the archive arising from archaeological work.	Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] also identifies areas to be protected in-situ. The principles of archaeological mitigation are outlined in the OAMS, which has been informed by a comprehensive programme of archaeological evaluation. A Detailed Archaeology Mitigation Strategy (DAMS), which will include arrangements for publishing results and the storage of finds, will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020]. The project archive of reports and archaeological finds would be deposited in a local museum once the archaeological excavations have been analysed and published. The publication of the archaeological results and the deposition of the archive would be appropriately funded.	RR-0025, RR-0203, RR-0330, RR-0332, RR-0327, RR-0412, RR-0719, RR-0671, RR-1393, RR-0920, RR-1063, RR-1099, RR-1909, RR-1708, RR-1901, RR-1686, RR-1893, RR-2173, RR-2352, RR-2332, RR-2369
Infrastructure at the Eastern Portal needs to be designed and located sensitively if the improvement is to be properly realised.	The design has been developed having regard to the impact of the eastern portal within the World Heritage Site. The eastern tunnel portal has been positioned within a dry valley in an area of low archaeological potential and will be further concealed within the landscape by a short length of canopy (see ES Chapter 6, Cultural Heritage [APP-044], Section 6.8). The further detailed design of the portal and its associated infrastructure will be sensitive to its WHS context, following Highways England's guide 'The Road to Good Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf), and will be developed in consultation with the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage).	RR-2007
More work is needed on the design of the road as the road leaves the western portal at	Taking into consideration similar feedback received from the statutory consultation undertaken in February - April 2018, in relation to the impacts of the scheme at the western end of the WHS, the suggestion of a wider bridge was adopted for the scheme that is the subject of the DCO	RR-1999, RR-2329

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>the western end of the WHS to protect OUV and designated heritage assets. The impact of the scheme on the Winterbourne Stoke and Diamond barrow groups is not acceptable without further mitigation. The bridge is currently of insufficient width to provide acceptable mitigation. A land bridge with a width of at least 150m is required.</p>	<p>application. Green Bridge No.4 was widened to approximately 150 metres and was the subject of the supplementary consultation undertaken in July and August 2018 and summarised in Chapter 6 of the Consultation Report [APP-026]. The wider bridge will provide greater physical and visual connectivity between the northern and southern parts of the WHS, including between the Winterbourne Stoke Crossroads Barrows and the Diamond Group in this western part of the WHS, with heritage, landscape and biodiversity benefits, details of which can be found in the respective ES Chapters: Chapter 6, Cultural Heritage [APP-044], Chapter 7; Landscape and Visual [APP-045]; and Chapter 8, Biodiversity [APP-046].</p>	
<p>Infrastructure at the Eastern Portal needs to be designed and located sensitively if the improvement (i.e. reuniting the Stonehenge Avenue, which is seen as beneficial to the OUV of the WHS) is to be properly realised.</p>	<p>The design has been developed having regard to the impact of the eastern portal within the World Heritage Site. The eastern tunnel portal has been positioned within a dry valley in an area of low archaeological potential and it will be further concealed within the landscape by a short length of canopy (see ES Chapter 6, Cultural Heritage [APP-044] Section 6.8). Its position will allow for the reconnection of the severed route of the Avenue where it is crossed by the current A303 (paragraph 8.8.12). The further detailed design of the portal and its associated infrastructure will be sensitive to its WHS context, following Highways England's guide 'The Road to Good Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf), and will be developed in consultation with the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage).</p>	RR-0839
<p>Changes in visitor footfall numbers is a potential indirect impact, and we would expect to see full information on the proposed mitigation.</p>	<p>In terms of in-direct impacts, as set out in ES Chapter 6, Cultural Heritage, Appendix 6.1, Heritage Impact Assessment, paragraphs 9.3.66 and 9.3.67 [APP-195], there was insufficient baseline data from heritage partners regarding current visitor flows and characteristics to enable assessment of potential change during scheme construction or operation.</p> <p>Although the HIA states that the effect is uncertain, the scheme includes measures to manage changes in visitor footfall and to ensure appropriate mitigation is in place. The new public rights</p>	RR-1743, RR-2134, RR-2201, RR-2088, RR-2220

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>of way, linking with existing byways, will make it easier for people to access and enjoy the Stonehenge part of the WHS as a whole. In the northern half of the WHS impacts from footfall are currently managed by English Heritage and the National Trust, with designated paths and routes to and from Stonehenge and the visitor centre, fenced public rights of way and the National Trust's open access policy. This management strategy will continue during scheme construction and operation. In the southern half of the WHS, monuments are within private land and not directly accessible to the public. In order to mitigate against potential impacts and manage footfall damage, visitors to this part of the WHS will only be able to explore the landscape using the new designated NMU route along the existing A303 alignment, which will be suitably surfaced and fenced in order to minimise impacts from visitor footfall on buried archaeological remains, or by using the existing fenced public rights of way and byways to the south. These design principles have been agreed with heritage partners and the fencing and surfacing within the WHS shall be developed in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council, as secured in the Outline Environmental Management Plan (OEMP) [APP-187] (D-CH14).</p>	
<p>Concerns that the construction phase poses a significant risk to the WHS.</p>	<p>Archaeological remains within the WHS would be excavated and recorded during the preliminary works phase, in advance of construction. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] also identifies areas to be protected in-situ, particularly those that contribute to the OUV of the WHS. The principles of archaeological mitigation are outlined in the OAMS, which has been informed by a comprehensive programme of archaeological evaluation. A Detailed Archaeology Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group and its implementation is secured by paragraph 5 of Schedule 2 to the DCO [APP-020]. Further, as part of the full EIA process, and as a requirement of the DCO, an Outline Environmental Management Plan (OEMP) [APP-187] has been prepared that sets out general and topic-specific principles and requirements for the control, mitigation and monitoring of potential construction impacts, particularly in relation to protection measures for monuments that contribute to the OUV of the WHS. Highways England's appointed contractor will be required to comply with the OEMP, and paragraph 4 of Schedule 2 of the DCO requires the scheme to be carried out in accordance with the OEMP. Through the adoption of these measures, significant risks will be avoided.</p>	<p>RR-0698, RR-1495, RR-1623, RR-1025</p>
<p>Eastern portal - The eastern tunnel portal is proposed to be</p>	<p>The design has been developed having regard to the impact of the eastern portal within the World Heritage Site. The eastern tunnel portal has been positioned within a dry valley in an area</p>	<p>RR-0870</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>located to the east of King Barrow Ridge and the Avenue. The design and location of the portal needs to carefully consider the setting of key monuments in this part of the WHS, especially the Avenue to the east and Vespasian's Camp to the south.</p>	<p>of low archaeological potential, and it will be further concealed within the landscape by a short length of canopy (see ES Chapter 6, Cultural Heritage [APP-044] Section 6.8). It will allow for the reconnection of the Avenue where it is crossed by the current A303 (paragraph 8.8.12), resulting in a permanent large beneficial effect, as reported in Table 6.11. Further, the scheme would maximise the re-use of the existing dual carriageway, avoiding impacts on the setting of Vespasian's Camp such that there would be no permanent adverse effects. During construction, as a result of the construction of the main carriageway and eastern tunnel portal, there would be a slight adverse, and so non-significant, effect on Vespasian's Camp due to aural impacts, as reported in ES Appendix 6.8, Table 1.1 [APP-217]. The further detailed design of the portal and its associated infrastructure will be sensitive to its WHS context, following Highways England's guide 'The Road to Good Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf), and the design will be developed in consultation with the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage).</p>	
<p>Officers would expect to see a full and detailed ES 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). The results of the EIA and HIA will need to feed into an Archaeological Mitigation Strategy and CEMP.</p>	<p>A full EIA, including a cultural heritage assessment, as set out in ES Chapter 6 [APP-044], and a heritage impact assessment (HIA), as set out in ES Appendix 6.1 [APP-195], has been undertaken and is reported in the ES, which has been submitted as part of the DCO application. The HIA was carried out in accordance with ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (2011) (https://www.icomos.org/world_heritage/HIA_20110201.pdf), and was overseen by the Heritage Monitoring Advisory Group (HMAG), which includes Wiltshire County Archaeology Services (WCAS), Historic England, National Trust, and English Heritage. The HIA was also carried out in accordance with the methodology set out in the HIA Scoping Report (http://assets.highwaysengland.co.uk/roads/road-projects/A303+Stonehenge/Heritage_Impact_Assessment_Scoping_Report1.pdf), which was endorsed by HMAG and UNESCO/ICOMOS (see HIA section 3.3, paragraph 3.3.4-3.3.6). The EIA and HIA have considered both temporary and permanent impacts of the scheme and have informed the Outline Environmental Management Plan (OEMP), the ES Appendix 2.2 [APP-187] and Outline Archaeological Mitigation Strategy (OAMS), ES Appendix 6.11 [APP-220]. A Detailed Archaeology Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group prior to the end of Examination and is secured by paragraph 5 of Schedule 2 of the draft Development Consent</p>	<p>RR-1683, RR-1896</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	Order [APP-020]. Paragraph 4 of Schedule 2 of the draft Development Consent Order requires that the scheme is carried out in accordance with the OEMP.	
Archaeological Mitigation Strategy will need to be agreed and its implementation secured by a condition / requirement attached to any grant of consent.	An Outline Archaeological Mitigation Strategy (OAMS) has been submitted with the ES, Appendix 6.11 [APP-220], as part of the DCO application. A Detailed Archaeology Mitigation Strategy (DAMS), based on the outline strategy, will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group prior to the end of Examination. The requirement for the implementation of the DAMS is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020].	RR-1686, RR-1681, RR-2329
Ensure all necessary archaeological survey and evaluation of areas likely to be affected by the scheme are completed before the public examination of the scheme takes place.	A full and comprehensive programme of archaeological evaluation surveys has been completed. The results of the archaeological evaluations were considered for the submission of the ES and the HIA [APP-195]. The archaeological evaluation reports confirm the archaeological baseline and the approach to mitigation. These have been reviewed in line with the ES tables that detail the impacts and the significance of effects (Section 6.9 in Chapter 6 and Appendix 6.8). No additional significant effects have been identified.	RR-1504, RR-1879
Lack of care in undertaking archaeology survey has resulted in archaeological damage to the WHS and archaeology elsewhere.	All archaeological work has conformed to Chartered Institute for Archaeologists' (CIfA) Standards and Guidance and has been undertaken in accordance with the relevant guidance, including DMRB Volume 11, Section 3 Part 2 (http://www.standardsforhighways.co.uk/ha/standards/dmr/vol11/section3/ha20807.pdf), and with full consideration of the Research Framework for the Stonehenge, Avebury and Associated Sites WHS (2016) (http://www.stonehengeandaveburywhs.org/assets/Stonehenge-Update.pdf). The scope of the field work programme has been developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group. All archaeological surveys have been undertaken in the presence of an appropriately-qualified archaeologist. No work has been carried out during unsuitable conditions, during which time plant operations were stood down to avoid any risk to archaeology.	RR-0097, RR-0226, RR-0346, RR-0216, RR-0485, RR-2288, RR-2303, RR-2134, RR-2201, RR-2088, RR-2220
Even with the Scheme, the world heritage site (WHS) including the Solstice's sunset, will be spoilt by vehicle headlights.	The removal of the existing surface A303 into a 2-mile long bored tunnel, particularly where it currently crosses the winter solstice sunset alignment southwest of Stonehenge, would benefit this Attribute of the OUV of the WHS through the removal of traffic and modern road infrastructure from views towards the winter solstice sunset. Outside the tunnel, the Scheme alignment avoids any risk of the road intruding on the view of the	RR-0226, RR-0346, RR-0216, RR-0485, RR-2288, RR-2303, RR-2134, RR-2201, RR-2088, RR-2220

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>setting sun from Stonehenge during the winter solstice. There would also be no visibility of any Scheme structures in the backdrop of the horizon containing the winter solstice sunset alignment.</p> <p>The proposed Scheme will have no lighting within the WHS beyond that necessary within the tunnel and beneath the c. 150 metre wide Green Bridge No. 4 near Longbarrow junction. There will be no lighting within the open cutting, and tunnel lighting will be designed to minimise light spill outside of the tunnel portals. Lighting under Green Bridge No. 4 will only operate during daylight hours. There will be no roadside lighting at the new Longbarrow Junction, and the improved Countess junction will utilise new directional roadside lighting to minimise light spill. This lighting is provided for in the Outline Environmental Management Plan (OEMP) [APP-187] (D-CH9 to D-CH12), and paragraph 4 of Schedule 2 of the DCO [APP-020] requires the scheme to be carried out in accordance with the OEMP. These are significant improvements over the current situation, where both Countess and Longbarrow junctions are brightly lit.</p> <p>There would therefore be no risk of roadside or tunnel approach lighting affecting the experience of the winter solstice sunset. Due to the deep road cutting which forms the western approach to the tunnel (and is not on the alignment of the winter solstice sunset viewed from Stonehenge), vehicular lights would not intrude on the winter solstice sunset alignment. It is assessed that the Scheme would have a large beneficial effect overall on this Attribute of the OUV of the WHS, as concluded in the Heritage Impact Assessment (HIA), ES Appendix 6.1 [APP-195].</p>	
<p>Consultation with external experts as a whole has been inadequate, including in relation to matters of archaeology, heritage and engineering. For example, the respected Avebury and Stonehenge Archaeological and Historical Research Group (ASAHRG) was not consulted during the early</p>	<p>Heritage has been a key consideration during route selection and consultation, being one of the Scheme's objectives to help conserve and enhance the WHS. Highways England has engaged regularly with key heritage stakeholders, throughout the Scheme's development, including through the Heritage Monitoring Advisory Group (HMAG), which includes Wiltshire Council Archaeology Services (WCAS), Historic England, National Trust, and English Heritage, and the Scientific Committee of eminent archaeological experts. Their involvement will continue up to and through construction and is secured as part of a Detailed Archaeology Mitigation Strategy (DAMS), which is being developed in consultation with WCAS and the HMAG and which is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020]. More information on engagement with archaeological and other heritage experts can be found in the ES Chapter 6, Cultural Heritage [APP-044] and the Consultation Report [APP-026].</p>	<p>RR-0375, RR-0728, RR-1408, RR-0963, RR-1005, RR-0877, RR-1918, RR-1895, RR-2081, RR-1734, RR-1721, RR-2028, RR-2209, RR-2053, RR-2075, RR-2353</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>stages of scheme development. Not enough weight has been placed on heritage issues during route selection and consultation.</p>	<p>Regarding Avebury and Stonehenge Archaeological and Historical Research Group (ASAHRG) specifically, they were involved in and responded to the public consultation held on route options in early 2017 before the preferred route was chosen, and regular presentations have also been given at ASAHRG's quarterly meetings to present aspects of the Scheme design and archaeological evaluation results. In addition, ASAHRG attended an extraordinary meeting of heritage stakeholders on 30th July 2018 to discuss ongoing matters following the 2018 statutory consultation and the developing heritage impact assessment. Details of consultation with heritage stakeholders is provided in the Consultation Report [APP-026].</p> <p>The preferred route was carefully chosen to minimise effects on archaeology and to avoid known archaeological remains, important sites and monuments. A comprehensive programme of archaeological evaluation surveys has informed the Scheme being designed in a way that has limited any direct physical impacts on archaeology as far as practicable. Examples of how the design has been developed to limit these impacts on archaeology include, but are not limited to, the choice of a northern bypass of Winterbourne Stoke, the reduced footprint and land take for Rollestone Corner, and the design and placement of the western and eastern tunnel portals and portal approaches in areas that have been shown to have limited archaeological remains within their footprint. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9.</p> <p>Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] identifies areas to be protected in-situ. The Heritage Impact Assessment (HIA), as set out in ES Appendix 6.1, HIA [APP-195], considers the implications of the Scheme in the context of the protection of OUV and the Authenticity and Integrity of the WHS. The HIA concludes that overall, the Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole. The OUV of the WHS would be sustained as set out in Section 12.4 of the HIA.</p>	
<p>Concerned that authorities are happy to have Stonehenge purely as a tourist attraction. We need to encourage further excavation and therefore</p>	<p>The Scheme looks to provide benefits for the WHS as a whole as well as Stonehenge itself. The Scheme also allows for better public access for walkers, cyclists and horse riders through the conversion of the existing A303 to a byway for non-motorised users, linking in to existing Public Rights of Way.</p>	<p>RR-0312, RR-0177, RR-0596</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
further answers from the past.	<p>The Scheme includes measures to facilitate the sharing and understanding of archaeological discoveries. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of the construction of the Scheme. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] also identifies areas to be protected in-situ. A Detailed Archaeology Mitigation Strategy (DAMS), which will include resourcing and arrangements for publishing results and storing/displaying finds, will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group prior to the end of the Examination and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020]. The project archive of reports and archaeological finds would be deposited in a local museum once the archaeological excavations have been analysed and published.</p> <p>The Scheme would create opportunities for greater public access to the WHS, and appreciation and enjoyment of it through increased connectivity of key monuments and monument groups north and south of the existing A303. The Scheme would enable beneficial opportunities for transmitting archaeological knowledge of the discoveries from the scheme's archaeological excavations, as well as increasing the public's awareness, understanding and perception of the Outstanding Universal Value of the WHS in a local, regional, national and international context. Further opportunities for public engagement within the WHS and its archaeology will be explored through the WHS Coordination Unit and the A303 Benefits Steering Group.</p>	
Changes to the water regime within the WHS, including as a result of artificial drainage and engineered cuttings, will lead to an invasion by algae and other organisms which will have detrimental impacts on the preservation of Stonehenge and other heritage features.	There are no proposed changes to the water regime within the WHS that would lead to an invasion by algae and other organisms. Therefore, there would be no detrimental impacts on the preservation of Stonehenge and other heritage features.	RR-0230
The World Heritage Site boundary should be extended to the (current) B3083 & Nett	The WHS inscription sets the boundaries of the site. Any change in the boundaries would be a matter for agreement with UNESCO. While this is outside the scope of the Scheme, the archaeological assessment has carefully considered the archaeology along the full length of the	RR-0306

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Rd to protect all the archaeology discovered west of the existing A360 boundary.	Scheme, whether inside or outside the current WHS boundaries.	
The Scheme proposals are in violation of / ignore the 1972 UNESCO World Heritage Convention.	In full recognition of its obligations under the Convention Concerning the Protection of the World Cultural and Natural Heritage (UNESCO 1972), the Government is making a substantial investment in funding a tunnel past Stonehenge to bring extensive benefits to the WHS. Compliance with UK Legislation and planning policies will be tested through the DCO process. The Applicant considers that the scheme does not violate the World Heritage Convention, for the reasons set out in section 7.2 of the Case for the Scheme [APP-294] submitted with the application.	RR-0021, RR-0016, RR-0116, RR-0196, RR-0743, RR-1209, RR-1504, RR-0870, RR-1782, RR-1754, RR-2335, RR-2209, RR-1896
A WHS landscape access plan will need to be developed and implemented to fully realise beneficial impacts in this central area in line with WHS Management policies.	Thank you for your suggestion. A key objective of the Scheme is to enhance public access and connectivity to and through the WHS. To achieve this, the Scheme is creating a number of new restricted byways, including along the route of the old A303, while maintaining the existing network of public rights of way. However, beyond these measures, development of a WHS landscape access plan is beyond the scope of the scheme and its DCO. Collaboration will nevertheless continue among stakeholders in relation to the WHS Management Plan in parallel with the continued development of the Scheme.	RR-2329
Irreparable damage to the WHS, its archaeology and setting, described by UNESCO as a 'landscape without parallel'. It must be protected for future generations.	<p>The removal of the existing A303 surface road from the WHS landscape will result in extensive benefits for the World Heritage Site (WHS) including beneficial effects to many heritage assets within the WHS. The cultural heritage assessment for the Scheme can be found in the ES, Chapter 6 [APP-044]. Detailed consideration of the assessment of the scheme in the context of the OUV of the WHS can be found in ES Appendix 6.1, Heritage Impact Assessment (HIA) [APP-195].</p> <p>Table 3 in the HIA shows the effects that the Scheme would have on the WHS in relation to its Attributes of OUV, Integrity and Authenticity. The table also shows how the Scheme would benefit the WHS in comparison with the effects of the existing A303. Overall, the Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole. The OUV of the WHS would be sustained.</p>	For a list of all RR that have raised this issue, please refer to Appendix H.

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>The preferred route was carefully chosen to minimise effects on archaeology, and a comprehensive programme of archaeological evaluation surveys has informed the Scheme design to limit direct physical impacts as far as practicable, including limiting impacts on archaeological remains that contribute to the OUV of the WHS. The design has been carefully chosen in order to preserve archaeological remains along the 2 mile section of tunnel, improve the setting of many heritage assets and asset groups in the central part of the WHS including the Avenue, Stonehenge itself and the Winterbourne Stoke barrow group; remove the intrusive sight and sound of traffic from the existing A303 as far as possible within the WHS; and design a scheme that is minimally intrusive in both the western and eastern parts of the WHS, including in key views from assets groups that contribute to the OUV of the WHS. Examples of how the design has been developed to limit impacts on archaeology include, but are not limited to, the choice of a northern bypass of Winterbourne Stoke, the reduced footprint and land take for Rollestone Corner, and the design and placement of the western and eastern tunnel portals and portal approaches in areas that have been shown to have limited archaeological remains within their footprint. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044]. Section 6.8, Table 6.9. The cultural heritage assessment, reported in ES Chapter 6, identifies the effects on known archaeological features whilst recognising the benefits that the tunnel will deliver for the WHS landscape as a whole.</p> <p>The Scheme includes measures to facilitate the sharing and understanding of archaeological discoveries. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of the construction of the Scheme. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] also identifies areas to be protected in-situ. A Detailed Archaeology Mitigation Strategy (DAMS), which will include resourcing and arrangements for publishing results and storing/displaying finds, will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group prior to the end of the Examination, and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020]. The project archive of reports and archaeological finds would be deposited in a local museum once the archaeological excavations have been analysed and published.</p>	
UNESCO's international advisers say the scheme	The recommendations of the UNESCO/ICOMOS missions carried out in 2015, 2017 and 2018 and the subsequent decisions of the World Heritage Committee have been considered carefully	For a list of all RR that have raised this

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>should not go ahead in its present form</p>	<p>and aspects of the design have been altered to address their recommendations. The World Heritage Committee decision with regards to the Scheme not proceeding in its current form refers to the scheme as was set out at public consultation in March 2018. The Scheme design has evolved substantially since that date, as put forward in the supplementary consultation and following that, the DCO application.</p> <p>UNESCO/ICOMOS recommendations and World Heritage Committee decisions have informed the development of the Scheme throughout its development and its design responds to these including: the route alignment selected as the preferred route avoiding the winter solstice sunset alignment and the bisecting of the Diamond Group; setting the road in deep retained cuttings to minimise landtake; determining the length of the tunnel to avoid the Scheduled Monument known as the Avenue (NHLE 1010140) at its eastern end and a Bowl barrow south of the A303 and north west of Normanton Gorse (NHLE 1010832) at its western end – the tunnel length has been extended to 2 miles (or 3km) in length; the further addition of 200m of canopy at the western portal and 85m of canopy at the eastern portal to further extend the tunnel (to almost 3.3km) to aid landscape integration; the optimization of the positions of the tunnel portals at the head of dry valleys in the landscape; in order to reduce the length of cutting (and minimise the length of the culvert part of the tunnel in the western approaches) the addition of the 150m long land bridge to maintain physical and visual connectivity between the Winterbourne Stoke Crossroads Barrows and the Diamond Group; the removal of the surface A303 into a tunnel and approach cuttings to reduce noise and improve the tranquillity of the WHS; in order to minimise light spill measures have included no lighting of the new Longbarrow Junction or the approach cuttings, new directional lighting at Countess Junction replacing the existing non-directional lighting, lighting of the portals would be designed to minimise light spill out in to the WHS landscape and lighting under the land bridge will only operate during daylight hours; and to minimise the visibility of new infrastructure within the WHS signage and other highways installations will sit completely within the approach cuttings and not extend above them. Further information on the missions, including how Highways England has considered the recommendations of UNESCO/ ICOMOS can be found in the Consultation Report [APP-026], Chapters 2 and 3.</p> <p>The Scheme design submitted for development consent has evolved substantially since the last UNESCO/ICOMOS mission was carried out in early 2018 and following submission of the DCO,</p>	<p>issue, please refer to Appendix H.</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>UNESCO has been notified of the application. It is expected that The State of Conservation Report (SOCR) prepared by the Department for Digital, Culture, Media & Sport will be considered at the next meeting of UNESCO's World Heritage Committee, scheduled for summer 2019.</p> <p>The World Heritage Committee decision recommended consideration of "further design refinement, with a view to avoiding impact on the OUV of the property, including longer tunnel options". Longer tunnel designs have been considered and discounted as they would not deliver sufficient additional benefits.</p>	
<p>Concerns about damage to Blick Mead Mesolithic site and its setting including:</p> <ul style="list-style-type: none"> • No full archaeology assessment has yet been undertaken. • Important remains have already been destroyed by the unauthorised drilling of a borehole on 2nd December 2018 (as per ENV#459) • Archaeologists were not involved in the drilling process and selection of borehole locations. • Blick Mead staff were not informed that the drilling was being undertaken. 	<p>The scheme would have no adverse impact on Blick Mead. Where it passes by Blick Mead, the scheme has been kept within the current highway boundary at the level of the existing A303 and would not touch the Blick Mead site. As there is no direct physical impact from the scheme, a full programme of archaeological assessment is not required. In addition, the scheme's potential impacts on groundwater levels and flows (including consideration of surface rainwater run-off to outfalls in the area of Blick Mead) have been assessed and the assessment shows there would not be any adverse effect on spring flows and the overall water regime at Blick Mead. Further information can be found in ES Appendix 6.8, Table 1.2 [APP-217], and ES Appendix 11.4, Annex 3, Blick Mead Tiered Assessment [APP-282].</p> <p>Regarding the drilling of boreholes, the applicant does not believe that the installation of its groundwater monitoring equipment, the location of which was shared with Professor David Jacques (Professorial Research Fellow in Archaeology, School of Humanities, The University of Buckingham who leads the archaeological work being undertaken at Blick Mead), has caused any damage to the Blick Mead site. Based on evidence provided by Professor Jacques' archaeological team to date, Highways England can confirm that none of the small diameter tubes were installed at Blick Mead in ground previously excavated. Highways England, and its consultants, have adhered to best practice guidelines in carrying out the work. A senior archaeologist was present on site, conforming to Chartered Institute for Archaeologists' (CIfA) Standard and Guidance, and due care has been exercised at all times. The applicant is committed to working with Professor Jacques to continue water monitoring at Blick Mead as part of his ongoing work.</p>	<p>For a list of all RR that have raised this issue, please refer to Appendix H.</p>

12 Health and Wellbeing, Socio-Economic Effects and Other Environment

12.1 Overview

- 12.1.1 A total of 113 interested parties raised matters regarding health and wellbeing, socio-economic effects and other environmental issues in their relevant representations.
- 12.1.2 Table 12-1 provides a summary of the key issues raised in relation to health and wellbeing, socio-economic effects and other environmental issues, alongside a response from Highways England.

Table 12-1: Health and Wellbeing, Socio-Economic Effects and Other Environment

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Objection to the proposed new car park at Parsonage Down.	The Scheme would not be providing additional parking within the Scheme boundaries and there would be no new car park at Parsonage Down.	RR-0122
This Scheme will increase greenhouse gas emissions.	The potential impact of greenhouse gas (GHG) emissions associated with the Scheme on the climate is assessed in ES Chapter 14, Climate [APP-052]. In the context of the UK carbon budget targets (more information at: https://www.gov.uk/guidance/carbon-budgets#setting-of-the-first-to-third-carbon-budget), against which the significance of a project's GHG emissions is measured, it is concluded that, whilst there would be an increase of GHG emissions, the emissions would not have a material impact on the Government meeting its carbon reduction targets, as set out in section 14.9, paragraphs 14.9.1 – 14.9.11 of ES Chapter 14 [APP-052]. Further, to support the delivery of a sustainable solution, the Scheme is being assessed using CEEQUAL, the evidence-based sustainability assessment and awards scheme, which includes sustainability measurement indices related to GHG and climate change. Highways England is aiming to achieve a CEEQUAL rating of Excellent, the highest rating possible.	RR-0034, RR-0323, RR-0056, RR-0240, RR-0277, RR-0591, RR-0383, RR-0624, RR-0595, RR-0616, RR-0469, RR-0814, RR-1226, RR-1372, RR-1363, RR-1277, RR-1516, RR-0921, RR-0917, RR-0943, RR-0948, RR-1011, RR-1023, RR-1050, RR-1121, RR-0875, RR-0888, RR-1585, RR-1898, RR-1671, RR-1878, RR-1863, RR-1771, RR-1661, RR-2054, RR-2087,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
		RR-2261, RR-1659, RR-1923, RR-2265, RR-2233
The Scheme should seek to use minimal electricity during construction and operation and use local and renewable energy where able.	The details of electricity use, including through construction and operation of the Scheme, will be developed during detailed design. To support the delivery of a sustainable detailed design solution, the Scheme will be assessed using CEEQUAL, the evidence-based sustainability assessment and awards scheme, which includes sustainability measurement indices related to resource efficiency, energy use, greenhouse gases and climate change. Highways England is committed to achieving a CEEQUAL rating of Excellent, the highest rating possible.	RR-1621
How will construction impacts be managed?	As part of the EIA process, an Outline Environmental Management Plan (OEMP) (provided at ES Appendix 2.2 [APP-187]), has been prepared that sets out general and topic-specific principles and requirements for the control, mitigation and monitoring of potential construction impacts. Compliance with this document is secured through the paragraph 4 of schedule 2 of the draft DCO. These control, mitigation and monitoring requirements have been incorporated in the assessments of effects for all environmental topics presented in the Environmental Statement.	RR-0413, RR-0437, RR-0891, RR-1862, RR-1681, RR-2283, RR-2195
How are cumulative effects considered through the EIA?	Cumulative effects are the result of multiple impacts on environmental receptors or resources, either from a combination of different projects or from a number of different environmental topics within a project. The cumulative assessment for the Scheme, which aligns with The Planning Inspectorate's Advice Note 17 (https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/12/Advice-note-17V4.pdf) and DMRB, Volume 11, Section 2, Part 5 (HA205/08) (Ref 15.2) (http://www.standardsforhighways.co.uk/ha/standards/dmr/vol11/section2/ha20508.pdf), is set out in ES Chapter 15, Cumulative Effects [APP-053].	RR-1683, RR-1536
How will vulnerable people and groups with protected characteristics be considered and protected?	The potential for the Scheme to impact on vulnerable groups and people with protected characteristics is assessed through the Equalities Impact Assessment (EqIA). The assessment has been developed in-line with the Equality Act 2010 and associated Public Sector Equality Duty (PSED). It assesses the potential for the Scheme to discriminate against or disadvantage people and makes recommendations for the advancement of equality. The EqIA concludes that the Scheme is likely to provide a range of benefits that can be shared with groups with protected characteristics including direct benefits such as walking and cycling provision. Whilst it also identifies the potential for a number of impacts where groups with protected characteristics may experience disproportionate or differential effects, it indicates that the mitigation measures	RR-1731

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	secured through the OEMP (compliance with this document is secured through the paragraph 4 of schedule 2 of the draft DCO) will help to minimise these negative impacts. Further details of the EqIA can be found in the Equalities Impact Assessment report [APP-296].	
Encouraged that Highways England are seeking to explore the legacy opportunities for the proposed Scheme to ensure the maximum possible legacy benefits for the WHS and the local community are realised.	Thank you for your comment. Highways England will continue to engage with the local community and relevant stakeholders in the identification and pursuit of legacy projects/benefits that fall outside of the scope of this DCO.	RR-1003, RR-1682
Street lights and vehicle lights should not be visible from the WHS.	There will be no open road lighting within the WHS, and the WHS will only include lighting necessary within the tunnel and beneath the 150m land-bridge. There will be no lighting within the open cutting, and tunnel lighting will be designed to minimise light spill outside of the tunnel portals. Lighting under the land-bridge will only operate during daylight hours between dawn and dusk and the Scheme will also remove the existing lighting at Longbarrow roundabout and replace existing lighting at Countess roundabout with new directional lighting to minimise light spill (see items D-CH8 to D-CH12 of the Outline Environmental Management Plan [APP-187], as set out in ES Chapter 2: The Proposed Scheme [APP-040], paragraph 2.3.50 to 2.3.52. The requirements for the main works contractor to define the proposed approach to site lighting during the construction phase are set out in the Outline Environmental Management Plan [APP-187] page 38, ref MW-G29 and MWBIO4, page 48, compliance with which is secured through the paragraph 4 of schedule 2 of the draft DCO. These are significant improvements over the current situation, where both Countess and Longbarrow junctions are brightly lit. Visibility of vehicle lights within the WHS west of Amesbury will be substantially reduced as they would be largely contained within the tunnel, in deep cutting or under the wide Green Bridge No. 4. This approach to lighting is assessed in para 7.9.129 of the Landscape and Visual Impact Assessment [APP-045] as resulting in a substantial reduction in lighting from vehicles within the WHS and a reduction in glare from vehicle headlights. The combination of the removal of existing lighting at Longbarrow Junction with the above measures is assessed within the LVIA as resulting in a moderate beneficial (significant) effect to the character of the night sky within the WHS, due to the noticeable reduction in glare.	RR-0235, RR-0130, RR-2022, RR-2063, RR-2170

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>Design solutions and options are needed at Longbarrow junction to minimise light pollution to dark skies from car headlights.</p>	<p>The Scheme's design has been developed and refined to minimise, as far as is practicable, the potential for visual (including light) impacts. This includes the use of cuttings, environmental bunds and screens. At the new Longbarrow junction, the A303 will be in a deep cutting 600 metres to the west of the existing Longbarrow roundabout on the western boundary of the WHS. This can be seen in the context of the Scheme's commitment to no road lighting of the Scheme during operation except under Green Bridge Four and Countess Roundabout (item D-CH11 of the OEMP [APP-187], compliance with which is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020]. The removal of the roundabout and its existing lighting will result in a moderate beneficial (significant) effect to the character of the night sky within the WHS, as reported in ES Chapter 7 [APP-045], paragraphs 7.9.124 – 7.9.131. The potential impact of the Scheme upon dark skies is also considered in the Heritage Impact Assessment [APP-195], section 9.3, paragraphs 9.3.13 – 9.3.19, which concludes that the Scheme would have a “moderate positive impact on this aspect of the WHS, resulting in a large beneficial effect.</p>	<p>RR-1548, RR-1999, RR-1957</p>
<p>Local people would suffer noise, poor air quality and inconvenience. All efforts should be taken to reduce the impacts on local communities.</p>	<p>The Scheme has been developed and refined to minimise as far as is practicable the potential for impacts on local communities. This includes the provision of environmental screening past Winterbourne Stoke and noise barriers on the Countess flyover. Temporary impacts during construction would also be minimised through the adoption of mitigation measures set out in the Outline Environmental Management Plan (OEMP) [APP-187] submitted with the DCO, for example, in relation to control of dust and noise, reducing the risk of spillage and pollution, and limiting or avoiding any disruption caused by materials being delivered to site. Compliance with the OEMP is secured under paragraph 4 of Schedule 2 within the draft DCO [APP-020]. Further information on the potential for impacts on people and local communities can be found in ES Chapter 5 - Air Quality [APP-043] section 5.9, ES Chapter 9 - Noise and Vibration [APP-047] section 9.9 and ES Chapter 13 - People and Communities [APP-051], section 13.9.</p>	<p>RR-0033, RR-0413, RR-0537, RR-0637, RR-1918, RR-2214, RR-1910, RR-1954</p>
<p>Heritage matters and stakeholders are benefitting at the expense of local communities.</p>	<p>The Scheme will bring a range of benefits. As well as delivering benefits for the WHS and the WHS landscape, local communities will benefit from: a much needed bypass for Winterbourne Stoke; separation of through traffic on the A303 from more local traffic on the A345 and A360, accompanied by reduced rat running and congestion on local roads, allowing local people to travel more easily and safely; and greater enjoyment of the countryside, including the WHS, via the enhanced public rights of way network. The wide range of permanent benefits of the Scheme are discussed in detail in the topic chapters of the ES [APP-043 - APP-054] and are summarised in the Non-Technical Summary [APP-292].</p>	<p>RR-0098, RR-0457</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>Winterbourne Stoke is impacted by the English Heritage visitor centre, particularly during the summer months, when glare from windscreens can be seen. Nothing is being done about this.</p>	<p>Mitigating the impacts of windscreen glare from the Stonehenge visitor centre is beyond the scope of the Scheme.</p>	<p>RR-0559</p>
<p>Who will monitor health and welfare of residents during construction? Who will address concerns during construction as disruption to local people's lives during construction and after will be immense?</p>	<p>Controls on construction impacts, such as noise and air quality, are set out in the Outline Environmental Management Plan (OEMP), in the ES Appendix 2.2 [APP-187]. The OEMP is secured by paragraph 4 of Schedule 2 of the draft DCO [APP-020]. A dedicated Community Relations Manager will keep local residents informed throughout construction of activities planned and progress being made and will ensure ready lines of communication are available at all times for queries or concerns to be raised. The environmental impact assessment, as set out in detail in the ES [APP-038 to APP-054], concludes that construction-related impacts would occur, though these would be reduced as far as reasonably practicable through the implementation of the measures in the OEMP Overall, once completed, the Scheme will deliver significant benefits for local people, including as a result of reduced rat running in local villages and reduction in traffic and associated effects through Winterbourne Stoke.</p>	<p>RR-0272</p>
<p>Negative impacts (noise, disturbance, pollution) during the 5-year long period of construction on the nearby residents, farms and businesses.</p>	<p>Local communities will be afforded careful consideration during the construction phase. Efforts will be made to open the bypass and junctions in advance of the tunnel section through the WHS to minimise disruption and secure the accompanying local benefits as soon as possible. The environmental effects on people during construction of the Scheme have been assessed in ES Chapter 5 - Air Quality [APP-043] section 5.9, ES Chapter 9 - Noise and Vibration [APP-047] section 9.9 and ES Chapter 13 -, People and Communities [APP-051], section 13.9. The Outline Environmental Management Plan (OEMP) in the ES Appendix 2.2 [APP-187], sets out measures that will be employed during construction to reduce, as far as is reasonably practicable, the potential for adverse impacts on local people, communities, and business including, for example, in relation to control of dust and noise, reducing the risk of spillage and pollution, and limiting or avoiding any disruption caused by materials being delivered to site. Compliance with the OEMP is secured under paragraph 4 of Schedule 2 within the draft DCO [APP-020]. Accesses will be maintained throughout construction, with temporary measures taken as appropriate. Overall,</p>	<p>RR-0297, RR-1031, RR-1130, RR-1535, RR-1758, RR-1628, RR-1930, RR-2283, RR-2150, RR-2108, RR-2354, RR-1606, RR-2345</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	once completed, the Scheme will deliver significant benefits for local people as a result of reduced rat running in local villages and reduction in traffic and associated effects through Winterbourne Stoke.	
Happy that you have done everything possible to secure environmental benefits.	Thank you for your comment.	RR-1869
Strong objection to the Scheme.	Your objection is noted and you will be able to make further representations during the DCO examination, if you so choose.	RR-0017, RR-0304, RR-0307, RR-0093, RR-0098, RR-0529, RR-0551, RR-0447, RR-1488, RR-1489, RR-1610, RR-1834, RR-1743, RR-2018, RR-2266, RR-2012
The bored tunnel would deliver huge benefits to the WHS by facilitating the removal of the damaging/intrusive surface road. Benefits include improving visitors' experiences, improving the setting of some of the county's most important prehistoric monuments and restoring tranquillity to this landscape.	Thank you for your comment.	RR-1681, RR-2329
Recognise the opportunity the Scheme brings to tackle the road's impact and welcomes the proposal to place the road in a cutting on the western approach to the tunnel which	Thank you for your comment.	RR-1879

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
will remove traffic causing a visual intrusion to much of the WHS landscape.		
The Scheme should have as little impact on the operation of farms as possible, including limiting loss of land and disruption of access.	The principal mitigation for the avoidance and minimisation of impacts on farm operations has been the ongoing development and refinement of the design, including maintenance and improvement of farm access via green bridges and reduction of the Scheme footprint to minimise land loss. The assessment of effects on agricultural operations is set out in the Environmental Statement, Chapter 13, People and Communities [APP-051], which identifies significant temporary adverse effects on seven agricultural holdings during construction and permanent adverse effects on two agricultural holdings. Highways England is continuing to engage closely with landowners to limit, as far as is reasonably practicable, potential impacts on the operations of farms from the Scheme.	RR-0596, RR-1610, RR-1977
Increased traffic will bring increased litter. How will you manage this?	The new road will be a free-flowing dual carriageway with quicker, more reliable journey times, enabling people to spend less time on the road, which may lead to reduced litter. The responsibility for litter collection for the majority of the A303 through Wiltshire currently sits with Wiltshire Council.	RR-1039, RR-2269
The Scheme protects archaeology as much as it can and will greatly enhance the WHS.	Thank you for your comment.	RR-0691

13 Agriculture, Land and Compulsory Acquisition

13.1 Overview

- 13.1.1 A total of 41 interested parties raised matters regarding agriculture, land and compulsory acquisition in relation to the scheme in their relevant representations.
- 13.1.2 Table 13-1 provides a summary of the key issues raised in relation to agriculture, land and compulsory acquisition, alongside a response from Highways England.

Table 13-1: Agriculture, Land and Compulsory Acquisition

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
New land boundaries - how will they be maintained?	New land boundaries created by the Scheme will be provided as appropriate for the relevant land use. Once the specification is agreed between landowners and Highways England and the new boundary treatment is in place, responsibility for the on-going future maintenance of these will be passed to the landowner. Accommodation work discussions have begun with affected landowners and occupiers, and with the land agent representing the three parties that have raised this as an issue in their Relevant Representations. Details and specifications regarding reinstatement and accommodation works relating to boundary treatment/accesses, barriers/gate arrangements, future boundary maintenance and internal farm accesses are currently being discussed, with a view to agreeing solutions acceptable to all parties.	RR-1586, RR-1542, RR-1583
If my property is devalued by the project, will Highways England compensate me for this?	Any claims related to property devaluation as a result of the Scheme will be assessed independently by the Valuation Office. If you think the Scheme has affected the value of your property, please inform Highways England and it will be assessed accordingly.	RR-0297, RR-1508, RR-1706, RR-1588
My access is due to be affected by the scheme, what will Highways England do about this?	Discussions have begun with landowners and occupiers affected by the Scheme. Details of both temporary and permanent work relating to accesses which are the subject of these Relevant Representations are currently being discussed with the relevant parties. Accesses are to be retained where possible; alternatively, proposals for replacement accesses will be developed and agreed with the affected landowner or occupier. Where the retention or replacement of an access is unachievable then appropriate compensation will be made by	RR-1046, RR-1043, RR-1588, RR-2237, RR-2201, RR-2108, RR-2354, RR-1606, RR-2345

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	Highways England.	
Ensure communication with the affected landowners and asset owners is maintained throughout the project.	Regular meetings and updates are taking place with the affected landowners, occupiers and asset owners. Highways England has met with those affected by its proposal to use powers of compulsory acquisition and temporary possession. Meetings have included discussion of issues raised in affected persons' Relevant Representations, such as the nature of necessary accommodation works, the acquisition of land through agreement, and arrangements relating to ongoing survey access requirements for the Scheme. This engagement will continue as the Scheme is progressed, to ensure that those individuals' requirements are met wherever reasonably practicable.	RR-2288, RR-2303, RR-2134, RR-1588, RR-2237, RR-2201, RR-2088, RR-2220
My business will be affected by the project, what will Highways England do about the effect this has?	Potential construction impacts will be minimised as far as reasonably practicable through the implementation of the Outline Environmental Management Plan (OEMP) [APP-187]. Permanent impacts have been incorporated into the design and accommodations provided where possible. Any negative effects on business as a result of the Scheme will be assessed independently by the Valuation Office. If you think the Scheme has affected your business in this way, please inform Highways England and they can advise or assess accordingly.	RR-0037, RR-0835, RR-1442, RR-1910, RR-2288, RR-2303, RR-2134, RR-0858, RR-1364, RR-1594, RR-1584, RR-2201, RR-2108, RR-2354, RR-1606, RR-2345, RR-2088, RR-2220
How will land be acquired and what is the project timeline for this? General Vesting Declarations should not be determined until construction has been completed. Concern that there will be no obligation on Highways England to return all the surplus land upon completion of the works and that surplus land returned may be done so at a higher price than that for which it was acquired.	Land required permanently will be acquired through individual agreement with landowners and occupiers or via compulsory purchase under the General Vesting Declaration ('GVD') process. The land acquisition process is likely to begin in 2020 if the Scheme receives development consent. In addition to including powers of compulsory acquisition, the draft development consent order ('DCO') also includes powers to take temporary possession of land for the purposes of constructing (and later maintaining) the Scheme. Where land is required temporarily for the purpose of constructing the Scheme (i.e. the land shown shaded green on the Land Plans [APP-005]), such land would not be acquired by Highways England; it would only be occupied and used during the construction period, for example for the provision of construction compounds or for the storage of materials. When the need for such temporary uses had ceased, the land would be reinstated and returned to its owner. Alternatively, where land is intended to be acquired permanently, powers of temporary possession may initially be used (and permanent works carried out under temporary possession powers) until the land requirements are finalised. Acquisition would then take place in respect of the land required	RR-1537

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>for the as-built Scheme. The purpose of this two-staged approach is to ensure that Highways England does not acquire more land than is necessary for the Scheme. Temporary possession will be taken by serving notice of the intended entry on affected landowners and occupiers. Powers to take temporary possession or to compulsorily acquire land under the DCO must be exercised within 5 years of the date on which the DCO comes into force. Highways England considers that the land included in the DCO is the minimum land-take required to construct, operate, maintain and mitigate the Scheme and is therefore necessary to achieve the objectives of the Scheme. Highways England has sought to achieve a balance between minimising land take and securing sufficient land to ensure delivery of the Scheme, noting that the detailed design of the Scheme has yet to be developed. In that context, the Scheme Order limits have been drawn as tightly as possible so as to avoid unnecessary land take. In the event that less land proves to be required in a particular area following the detailed design stage, Highways England would only seek to acquire that part of the Land that is required and, in all events, will seek to minimise effects on landowners (Statement of Reasons, para 5.3.4 [APP-023]).</p>	
<p>Unjustified land-take to the north-west of Longbarrow Roundabout (including compound areas, boundary fence alignments, settlement ponds).</p>	<p>The construction compound requirements for the tunnelling operations are, by necessity, more extensive than for a traditional surface highway scheme. This is due to the need for additional infrastructure to support the tunnelling operations, such as precast concrete and slurry treatment plants. The location for the main works compound has been selected to be outside the WHS, close to the tunnel's western portal and adjacent to the A360 and proposed A303 to provide good highway and haul route links. The areas for satellite compounds and works areas have been minimised as far as possible, whilst still providing sufficient space for the safe construction of the Scheme. Land is required in this location on a temporary basis to accommodate the main compound which has been optimally sited to facilitate the efficient construction of the Scheme. Details of the construction compounds are provided in the Environmental Statement ('ES'), Chapter 2 [APP-040] (see paragraph 2.4) and Figure 2.7 [APP-061] (showing an indicative site layout) and in the Outline Environmental Management Plan, Appendix 2.2 of the ES [APP-187]. On completion of the Scheme, the construction compounds will be removed and the land will be reinstated and returned to the landowner/occupier.</p>	<p>RR-2108, RR-2354, RR-1606, RR-2345</p>
<p>Will Allington Track revert to the adjacent landowners once</p>	<p>A portion of the existing Allington Track (identified as plot 11-25 on the Land Plans [APP-005]) is proposed to be stopped up under the DCO and is not required to be transferred into</p>	<p>RR-1586, RR-1542</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
stopped up by the Scheme?	Highways England's ownership as part of the Scheme. The ownership of the length of Allington Track which is proposed to be stopped up is currently unregistered with HM Land Registry; as such, land up to and either side of the middle of the highway is owned by the adjoining landowners on either side of the highway, and this will not change when it is stopped up. However, new rights are required over this plot for the installation, use, protection and maintenance of, and access to, statutory undertakers' apparatus (for the benefit of the relevant statutory undertaker), as set out in Table 2 of Annex A of the Statement of Reasons [APP-023].	
Farm Subsidy Schemes, in common with the agricultural industry in general, own subsidy entitlements and submit annual claims under the Basic Payment Scheme. How will these be compensated if affected?	If subsidy entitlements are affected by the Scheme and if landowners or occupiers are able to prove a consequential loss, the submitted evidence will be assessed independently by the Valuation Office and compensation provided as considered appropriate.	RR-2288, RR-1583
Severance cannot be entirely eliminated by features incorporated within the design. We seek the relocation of farm infrastructure / farmsteadings such that it is not severed by the alignment.	The relocation of the farm infrastructure is something Highways England has been discussing with the affected landowners and is willing to assist with as the Scheme develops. The costs associated with the relocation of any farming infrastructure, subject to any required planning consent, is being discussed with the Valuation Office as part of agreeing the amount of compensation to be paid.	RR-2108, RR-2354, RR-1606, RR-2345
My land is subject to Natural England stewardship schemes and receives subsidies for basic payment schemes. If these are affected, how will Highways England compensate me?	If subsidy entitlements are affected by the Scheme and if landowners or occupiers are able to prove a consequential loss, the submitted evidence will be assessed independently by the Valuation Office and compensation provided as considered appropriate.	RR-2288
What will the final land use be of the old A360 at Rollestone	Proposals for the new Rollestone junction layout presented for statutory consultation were modified subsequently and were one of three changes to the Scheme proposals put forward	RR-1041

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>Junction? Could the land take to the east be minimised to ensure effective farming continues, and will the drainage arrangements be changed?</p>	<p>for the supplementary consultation carried out in July 2018. The modified layout is located in the north west corner of the field to the east of the B3086 within the WHS, as shown on sheet 13 of the General Arrangement Drawings [APP-012]. This layout will allow a section of the current B3086 to revert to agricultural land, connecting with the field to the west of the B3086. The road drainage will be designed to be self-contained within the new highway boundary. The proposed highway extents have been designed with the intention of minimising land take whilst ensuring the required Stopping Sight Distance (SSD) is achieved around the bend, where the realigned B3086 meets The Packway.</p>	
<p>How will the potential impacts on cattle and livestock be mitigated?</p>	<p>Access to adjacent landholdings will be maintained during and post-construction of the Scheme. Appropriate fencing will also be erected. Construction activities will be discussed with affected farmers to understand and address any concerns that can be taken into consideration as far as is reasonably practical in planning and carrying out the works. The potential for impacts on agricultural operations, including in relation to cattle and livestock, is considered through the people and communities assessment, as set out in the Environmental Statement, Chapter 13, People and Communities [APP-051], section 9. Potential construction impacts will be minimised as far as reasonably practicable through the implementation of measures contained within the Outline Environmental Management Plan (OEMP) [APP-187], which is secured through paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020].</p>	<p>RR-1583, RR-2108, RR-2354, RR-1606, RR-2345</p>
<p>What is the soil management plan / concerns regarding the impact of the Scheme on the agricultural land?</p>	<p>The Scheme design seeks to minimise the areas of land required both temporarily and permanently. Land occupied and used temporarily for the construction of the Scheme (pursuant to powers of temporary possession in the Development Consent Order (DCO)) would be subsequently restored to the reasonable satisfaction of its owner.</p> <p>As set out in the Outline Environmental Management Plan (OEMP) [APP-187], at mitigation measure MW-GE03, prior to works commencing, the appointed contractor will be required to produce a detailed Soil Management Plan, which will set out the requirements for soil handling, storage and treatment. The OEMP will be secured under paragraph 4 of Schedule 2 to the draft DCO [APP-020].</p> <p>The potential for the Scheme to affect agricultural land is assessed in the Environmental Statement, Chapter 13, People and Communities [APP-051], which concludes that, after</p>	<p>RR-1671, RR-1542, RR-1583</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	restoration of agricultural land used temporarily for construction, there would be a moderate adverse residual effect on <i>"Best and Most Versatile"</i> land, as summarised in Table 13.26.	
Park Farm and West Amesbury Farm need to accommodate movements of large vehicles (combine harvesters, circa 4m wide), which could be problematic if the only access to the farms were to be via Amesbury.	Farm access arrangements have been and will continue to be discussed with affected landowners and occupiers, including Park Farm and West Amesbury Farm. Highways England will seek to agree suitable alternative access arrangements with the affected owners/occupiers of the two farms. If this is unachievable then appropriate compensation will be paid.	RR-1588, RR-2237
Challenge regarding the extent of proposed land take.	<p>As is explained in the Statement of Reasons [APP-023], at paragraph 5.3.4, Highways England considers that the Land included in the DCO is the minimum land-take required to construct, operate, maintain and mitigate the Scheme and is therefore necessary to achieve the objectives of the Scheme. Highways England has sought to achieve a balance between minimising land take and securing sufficient land to ensure delivery of the Scheme, noting that the detailed design of the Scheme has yet to be developed. In that context, the limits of the land have been drawn as tightly as possible so as to avoid unnecessary land take. In the event that less land proves to be required in a particular area following the detailed design stage, Highways England would only seek to acquire that part of the land that is required and, in all events, will seek to minimise effects on landowners.</p> <p>Some areas of land within the Order limits are needed temporarily for construction purposes and are therefore shown within the DCO application as being subject to powers of temporary possession. These areas would be returned to the landowner once they were no longer needed for the construction of the Scheme.</p>	RR-0440, RR-1046, RR-1043, RR-2108, RR-2354, RR-1606, RR-2345, RR-1537
Lack of clarity on limits of deviation could result in unforeseen negative impacts on the WHS and its OUV.	The Environmental Statement [APP-039 – APP-054] and Heritage Impact Assessment [APP-195] consider the maximum area of land anticipated as likely to be required, taking into account the proposed limits of deviation (LoD) for the Scheme and the flexibility of detailed design provided for in the DCO [APP-040]. The assessments therefore take into consideration what can be regarded as a realistic 'worst case' assessment of the impacts associated with the proposed scheme. Therefore, any movement within the design LoD would not result in a	RR-2329

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	worsening of significant effects reported in the respective assessments.	
The restrictions proposed on land use above the tunnel are inappropriate.	As noted in the Statement of Reasons at paragraph 5.3.7 [APP-023], rights are required above the tunnel in order to enable Highways England to impose restrictive covenants to secure protection of the tunnel from potentially conflicting future development and works that might jeopardise the structural integrity of the tunnel. Highways England is completing further work to better understand and more precisely define the details of the required restriction and will continue to consult WHS partners. This will be documented within statements of common ground.	RR-2329
Concerns regarding access to land following closure of byway BULF12.	The DCO application includes provision for a private means of access for the benefit of the triangle of land on the north side of the A303 (at the eastern end of the Scheme), currently bisected by byway BULF12 and byway AMES2, both of which are proposed to be stopped up in furtherance of the Scheme. The proposed new private means of access is shown on the Rights of Way and Access Plans as reference 28 on Sheet 11 [APP-009] (see inset 2 on Sheet 11). The private means of access would follow the line of existing byway BULF 12, such that access would be taken from the south side of the crossroad junction of Amesbury Road and the B3028 Double Hedges (at the top of the triangle of land).	RR-1594, RR-1792
The new parcels of open space at Solstice Park/Allington Track tie in should either be fenced or planted (not currently proposed), to reduce security issues to the adjacent land holdings.	<p>Part of the stopped-up section of AMES1 has been identified as replacement land to be exchanged for open space that is required for the Scheme. The replacement land is identified on sheet 7 of the Special Category Land Plans [APP-006] as plots 10-17 and 11-33. These plots will be laid out as open space.</p> <p>Fencing will be provided between the open space and the adjacent land holdings. There are currently no plans to include any planting, however this could be considered in discussions in relation to accommodation works.</p>	RR-1792
There is a concern that the loss of a direct access from the A303 will be detrimental to the trading performance of our business and other commercial units on the site.	If your business is adversely affected by the Scheme, you may be able to claim compensation. If you think the Scheme has affected your business, please inform Highways England and it can consider the matter accordingly. Any negative effects on business as a result of the Scheme will be assessed independently by the Valuation Office. You may wish to seek professional advice (the cost of which may be compensable by Highways England) before making a claim.	RR-1792
Ensure there are no adverse	Fishing and other recreational activities associated with the rivers Avon and Till are considered	RR-1583

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
impacts upon fishing activities within the River Avon or River Till.	as attributes of river importance and sensitivity, as set out in the Environmental Statement (ES), Road Drainage and the Water Environment [APP-049], Table 11.9 - Water environment receptors, attributes and importance. Recreation, in particular fishing, is considered to be an attribute of high importance for the River Avon. In the River Till, which, as a winterbourne, does not contain water along the full channel length all year round, recreation is considered to be an attribute of medium importance. As set out in ES Chapter 11, Section 11.7 [APP-049], potential impacts on the rivers and their associated attributes could include physical modification to the water courses or reduction in water quality, including through sedimentation, pollution events, or mobilisation of contaminants. However, with the avoidance of physical works within the river channels and with the implementation of the mitigation measures set out in the Outline Environmental Management Plan (OEMP) [APP-187], there would be no significant adverse effects on either the River Till or the River Avon, as concluded in Chapter 11, Section 11.9 [APP-049]. As such, it is considered that the Scheme will protect against adverse impacts on fishing activities.	
Drainage concerns in relation to grain storage facility at Countess Farm.	No likely significant adverse effects are identified for the water environment or for flood risk, including in relation to Countess Farm, as set out in the Environmental Statement, Chapter 11, Road Drainage and the Water Environment [APP-049], Section 11.9. All groundwater effects from the construction works at Countess Roundabout were found to be non-significant for the construction phase and the operational phase. All ponds would outfall to the existing highway ditches which ultimately discharge the runoff to the River Avon. The ponds would be designed to ensure no ingress from flood waters in the 1 in 100 year plus climate change event from the adjacent River Avon catchment. As such, there should be no cause for drainage concerns, in relation to the grain storage facility at Countess Farm, arising in consequence of the Scheme.	RR-1583
Concerns regarding a new proposed private access arrangement across Countess Farm for the benefit of Park Farm, Amesbury.	The main access benefitting Park Farm and West Amesbury Farm is proposed within the Order limits and will not cross Countess Farm or use the existing access off Countess Road. Farm access arrangements have been and will continue to be discussed with affected landowners and occupiers, including Park Farm, West Amesbury Farm, National Trust and Countess Farm. Suitable alternative access arrangements to accommodate large vehicle movements will be discussed with the affected landowners and occupiers, with a view to reaching an agreed solution. If this is unachievable then appropriate compensation will be paid.	RR-1588, RR-1583, RR-2237
Title for the land designated to	It is Highways England's opinion that the Overage Provision in the deed relating to Countess	RR-1583

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>the eastern compound contains a development uplift clause, benefiting the previous owner. The current owner seeks assurances in respect of this.</p>	<p>Farm, Amesbury, benefitting Historic England, would not be triggered by the making of the DCO as the Scheme is the event that creates the increase in value of the land. In the context of the compulsory purchase compensation code, the tested 'Pointe Gourde' principle (that any increase in value entirely due to the Scheme of the authority shall be disregarded for the purpose of compensation), is applicable to this situation.</p>	
<p>Assurances are needed over the 'Position Statement' process with the landowners. Increased commitment of resource by Highways England is needed to address outstanding matters and supply necessary information in a timely fashion.</p>	<p>It is intended that a Position Statement, once complete, will become a record of binding commitments agreed between Highways England and a landowner. Position Statements will not form part of the DCO application documentation, but will be private documents between the relevant parties.</p> <p>In terms of commitment to resource, the project team will be working closely with landowners to ensure the process of agreeing Position Statements runs efficiently. Highways England aims to ensure that questions raised in meetings (or in correspondence) are responded to within 10 working days.</p>	<p>RR-1586, RR-1542, RR-1583</p>
<p>Representation reserves the right to include within future written representations and within the subsequent Examination process any further areas of concern that may have been omitted in error, which may arise when additional detail is provided or becomes apparent through the DCO process.</p>	<p>Your comment is noted, we look forward to receiving your written representation in due course.</p>	<p>RR-1586, RR-1542, RR-1583, RR-2108, RR-2354, RR-1606, RR-2345</p>
<p>Access should be provided to the field to the south-west of the existing Rollestone crossroads. This would to reduce the need for agricultural traffic approaching</p>	<p>Regular meetings and updates are taking place with landowners, occupiers and asset owners. This process will continue as the Scheme progresses to ensure that those persons' individual requirements are understood and met wherever possible.</p>	<p>RR-1041</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
from the north to travel along the "diversion route" and would more closely replicate the current situation.		
Request that all of the field accesses be detailed and surfaced more discreetly than shown on the DCO drawings, to avoid attracting parking or antisocial behaviour. Our preferred design is slightly lowered, reinforced, vegetated verges.	Regular meetings and updates are taking place with landowners, occupiers and asset owners. These meetings will continue as the Scheme progresses and landowners will be provided with an opportunity to influence the detailed design of their affected field accesses as part of these discussions.	RR-1041
As the crossing point between the fields SW and SE of the crossroads has been moved from the top end of the fields (as existing) to the bottom, verge levels will need to be carefully detailed to prevent escape of any surface water from the fields.	Regular meetings and updates are taking place with landowners, occupiers and asset owners. These meetings will continue as the Scheme progresses and landowners will be provided with an opportunity to influence the detailed design of any necessary accommodation works. The detailed design process will consider both land and highway drainage as part of the surface water drainage design.	RR-1041
Request involvement in the detailed design of the field accesses.	Regular meetings and updates are taking place with landowners, occupiers and asset owners. These meetings will continue as the Scheme progresses and landowners will be provided with an opportunity to influence the detailed design of their affected field accesses as part of these discussions.	RR-1041
Future access to Esso pipeline is restricted thus rendering the asset unsafe should a fault or feature be identified.	Future access and maintenance requirements for the pipeline are the subject of discussion between Esso and Highways England, as are terms relating to Esso's strengthening and upgrading works to the pipeline, in the interests of future asset protection and public safety.	RR-1726
Concerns regarding third party	Through the Outline Environmental Management Plan (OEMP) [APP-187] which is secured	RR-1726

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
damage to Esso pipeline during and after construction.	<p>through paragraph 4 of Schedule 2 to the draft Development Consent order [APP-020], designated haul routes, including crossing points, which the contractor will be required to use during construction, will be confirmed prior to construction.</p> <p>Requirements for permanent strengthening and upgrading works to the pipeline, in the interests of future asset protection and public safety, are the subject of discussion between Esso and Highways England. The proposed thick wall pipe system and proposed final level of fill above the pipe are understood to provide sufficient protection to the asset after construction.</p> <p>In both the construction and operational phases, Esso-design protection slabs will also be provided where necessary.</p>	
Protective provisions regarding how Highways England will work in proximity to the Esso pipeline need to be agreed.	Discussions between representatives of Highways England and Esso, which are aimed at agreeing the terms of the Protective Provisions to be included in the Development Consent Order, are ongoing. Draft protective provisions are included in Part 4 of Schedule 11 to the draft Development Consent Order [APP-020] which Highways England considers to be appropriate for protecting Esso Petroleum Company Limited's undertaking.	RR-1726
A diversion agreement to cover the funding, routing, procurement, associated land rights and construction of any Esso pipeline diversion and subsequent abandonment needs to be implemented.	Discussions between representatives of Highways England and Esso, which are aimed at agreeing terms to address the design, procurement and construction of the Esso pipeline diversion and the length of existing pipeline to be abandoned, are underway and are currently ongoing.	RR-1726
Inappropriate and premature use of S172 powers.	Highways England's preferred method for gaining access to land is through agreement with the relevant landowners. Highways England provides each landowner the opportunity to enter into an agreement and negotiate terms of access. If agreement cannot be reached, Highways England has the ability to gain access to land through the exercise of its statutory powers. In the case of the A303 scheme, in order to prevent delay to programmed timescales, notices have been served under Section 172 of the Housing and Planning Act 2016 which confers power on Highways England to enter and survey or value land in connection with a proposal to	RR-2288, RR-2303, RR-2134, RR-2201, RR-2088, RR-2220

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	acquire an interest in or a right over land. As such, Highways England considers that its use of the power in section 172 was necessary, timely and appropriate.	
Unnecessary and expensive permanent land acquisition around the tunnel instead of remaining under farm ownership and farmed to deliver legacy benefits.	The land identified for permanent acquisition around the tunnel has been reduced to the minimum required in order to construct, operate and maintain the tunnel. It does, however, include a Limit of Deviation, within which the tunnel will be located following detailed design. Highways England will only acquire that land that is identified as required for permanent acquisition once the final detailed design is confirmed. It is to be noted that some land has been identified as required for essential mitigation around the tunnel to enable the portals and approach to be set below ground level and to allow the creation of areas of new species-rich chalk grassland, to minimise adverse cultural heritage impacts and for landscape and visual integration.	RR-0198, RR-2288, RR-2303, RR-2134, RR-2201, RR-2088, RR-2220
The Scheme has been presented for DCO process without decisions made regarding extent of landscaping areas and subsequent responsibility.	The approach to integrating the new road into the existing landscape is set out in the Design and Access Statement [APP-295]. As secured by paragraph 8 of Schedule 2 to the draft Development Consent Order [APP-020], the appointed contractor will be required to develop a landscaping scheme which is based on the landscaping approach set out in the DCO. This approach includes the provision of bunds and false cuttings, with sympathetic regrading of earthworks to match the existing natural rolling landform, along with planting of trees, where appropriate to the landscape character, hedgerow, shrub and extensive chalk grassland areas. The approach is described in the Environmental Statement (ES) Chapter 7, Landscape and Visual [APP-045] section 7.8, Design, Mitigation and Enhancement Measures and is shown indicatively on the Environmental Masterplan in Appendix 2.1 of the ES [APP-059]. Responsibility for subsequent land management is a matter which Highways England is willing to discuss with relevant landowners.	RR-2288
Objection to the proposed compulsory acquisition of the Beacon Land Hill Limited & Amesbury Property Company Limited freeholds by AMES1, due to be stopped up and converted to a public footpath, as it is not believed that it is necessary to achieve the	The power to acquire land permanently in this area would give Highways England the ability to extinguish existing rights over AMES1 to enable this byway to be changed in status from a byway open to all traffic to a public footpath. The power of acquisition sought would enable Highways England to effect this change in the status of AMES1 and would also accommodate a scenario in which the existing landowner did not wish to retain the land once its status had been changed by the Scheme. However, if the landowner accepts the land in its changed state, Highways England could agree not to implement its permanent acquisition powers over the land, allowing it to be retained by the existing landowner, subject to it having been dedicated as a public footpath.	RR-1542, RR-1537

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Scheme's objectives.	The proposed public footpath, labelled reference P on sheet 11 of the Rights of Way and Access Plans [APP-009] and described in Schedule 3 to the draft DCO [APP-020], would be of benefit to local people, by maintaining pedestrian access. The junction of AMES1 with the A303 would be closed to vehicular traffic, protecting the adjoining monument (tumulus) from further degradation and improving safety on the existing A303 by reducing the potential for conflict arising from traffic from the BOAT joining the A303. As such, and in providing safer NMU connections, the proposal contributes to the achievement of the Scheme's objectives of helping to conserve and enhance the WHS and provide a positive legacy for local communities.	
Green Bridge No. 4 creates small obscure land pockets, complicating land management.	The land around Green Bridge No. 4 is proposed to be acquired by Highways England because it is required for the provision of essential landscape mitigation associated with the Scheme. Post construction it will become chalk grassland, which will be managed by Highways England's estates department. It is therefore not considered that the acquisition of the land around Green Bridge No.4 will result in complicated land management requirements.	RR-2288, RR-2134, RR-2201, RR-2088, RR-2220
The rights currently planned to be retained by Highways England following the handing back of land used temporarily at Scotland Lodge Farm should be removed from the application.	The rights proposed to be acquired at Scotland Lodge Farm are required in relation to the diversion works and subsequent maintenance of the Esso pipeline and are therefore required for the benefit of Esso, not for Highways England, in order to facilitate the diversion (and reinstatement) of the existing Esso pipeline from its current position to a new location which accommodates the Scheme.	RR-1046, RR-1043
Minutes from meetings with Highways England should be freely available to the Planning Inspectorate.	Minutes from meetings held with Highways England will be available to the Planning Inspectorate where requested or where submitted as evidence.	RR-1588
As Settlement Pond 1 has been removed from the Scheme, the red line in the vicinity of Foredown House can be relocated closer to the	Highways England has included this land in the DCO application to ensure that delivery of the Scheme will be possible. At this stage, Highways England anticipates that the land will be needed for the reasons set out in the Statement of Reasons, in Table 4 of Annex A (see reference to plot 4-04) [APP-023] which, in the main, relate to the provision of working space during construction. If, once a contractor has been appointed, it turns out not to be the case,	RR-2108, RR-2354, RR-1606, RR-2345

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
proposed route alignment.	then Highways England would not use all of the land within the Order limits – in particular the land closest to Foredown House.	
The current proposal for the staggered gate on the Kighton track is inadequate; it needs to allow access and prevent illegal parking.	Accommodation work discussions have begun with affected landowners and occupiers, who will be given an opportunity to influence the design of accommodation works. Highways England is willing to explore the possibility of revising the current access proposal relating to the link to the old A360 opposite Kighton track.	RR-2108, RR-2354, RR-1606, RR-2345
Request that the Inspector orders a binding Water Supply obligation upon the acquiring authority.	<p>Highways England, as the Scheme promoter, is responsible for ensuring that groundwater resources, including the supply and quality of groundwater, are protected during the construction and operation of the Scheme. Potential impacts on water supplies will be mitigated through the implementation of measures included within the Outline Environmental Management Plan (OEMP) [APP-187] (at references PW-WAT1 and WAT2, and MW-WAT1, WAT2, WAT3, WAT4, WAT5, WAT6, WAT7, WAT9, WAT10, WAT14, and WAT15), which is secured through paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020].</p> <p>As set out in the Environmental Statement, Chapter 11, Road Drainage and the Water Environment [APP-049], section 11.9, the assessment shows no significant changes to hydrology, private water supply, surface water quality or groundwater quality (water supply) during either the construction or operational phases of the Scheme. Highways England has been working with and will continue to work with Wessex Water and other statutory utility providers as required to ensure that water supplies are protected during the construction and operation of the Scheme.</p>	RR-2108, RR-2354, RR-1606, RR-2345
Absolute provision (legal and practical) must be made for full, unimpeded access between B3083 to land and property in Manor Farm's ownership to east of the road. Classification of access should be private right of way only.	Access between the B3083 and land / property in Manor Farm's ownership to the east of the road will be provided as private means of access reference 8, as shown on Sheet 3 of the Rights of Way and Access Plans [APP-009]. Accommodation work discussions with affected parties are underway and include consideration of access requirements as raised in Relevant Representations.	RR-2108, RR-2354, RR-1606, RR-2345

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>Access to Settlement Pond 3 should be routed from the east alongside A303 and not via a separate track.</p>	<p>The Settlement Pond referred to in the representation is proposed to be located immediately east of the River Till and south of the proposed dual carriageway in land identified as Plot 04-17 on the Land Plans, Sheet 4 [APP-005]. The route proposed (in the western section of Plot 04-22) is the shortest route available while minimising severance to Plot 04-21. A potential alternative route for a private means of access from byway WSTO6B and Green Bridge No. 2 would be longer and would require additional earthworks. The proposed access to Settlement Pond 3 has been designed so that it follows an existing field boundary to minimise the impact on farming operations.</p>	<p>RR-2108, RR-2354, RR-1606, RR-2345</p>
<p>Highways England are merely cooperating with English Nature to achieve an extension of the existing Parsonage Down SSSI by taking the easiest option available and not carrying out the agricultural assessments required to justify the need for a compulsory acquisition of 137 acres of very productive arable land.</p>	<p>There is no agreement in place between Highways England and Natural England in respect of the creation of an extension to the existing Parsonage Down SSSI. The Scheme will generate considerable volumes of material, from the excavation of the tunnel and from cuttings, where the road will be below existing ground level, which needs to be managed. Some of the excavated material will be reused as part of engineered embankment slopes and some will be used for essential landscape mitigation to integrate the Scheme into the surrounding landscape and mitigate the visual impact of the Scheme. However, there will still be surplus excavated material that will need to be accommodated. Highways England has undertaken an examination of potential options for the excavated material, including transporting it away from the site to landfill, and it has been determined that the environmental (traffic, noise and air quality) impacts arising from the removal of the excavated material to off-site landfill/quarry locations could result in significant environmental effects. Therefore, the option of local deposition was adopted and an assessment of nine possible deposition locations was carried out. Agricultural land classification (land quality) was one of the criteria against which each potential site was assessed. Further information can be found in the Environmental Statement, Appendix 12.1, Tunnel Arisings Management Strategy [APP-285].</p> <p>Proposals for the compulsory acquisition of the land east of Parsonage Down are justified on the basis that at present, whilst it is understood that the land could be restored to calcareous grassland once the excavated material was in place, it cannot be confirmed that the land could be returned to its former agricultural classification. Accordingly, the compulsory acquisition powers are sought to accommodate a scenario in which the landowner no longer wished to retain the land in its changed state. Negotiations with the landowner are ongoing.</p>	<p>RR-2240</p>
<p>If all the land owned by Mr</p>	<p>The land to the south of Parsonage Down, as referred to in the representation, forms part of</p>	<p>RR-2240</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>Moore is acquired (as proposed in the DCO application), this would result in a 21% loss in his owned area which will have social and economic effects that have not been considered. If the land south of Parsonage Down was used instead, it would have little or no effect on the business operated by English Nature.</p>	<p>the Guinness Estate and is not owned by Natural England.</p> <p>The impacts on agricultural land of the temporary possession and permanent acquisition powers sought in the draft Development Consent Order [APP-020], including in the context of Mr Moore's land, are considered in the agricultural impact assessment presented in the Environmental Statement (ES), Chapter 13, People and Communities, Section 9 [APP-051], and are summarised in Tables 13.22 and 13.23. The assessment has considered the effect on best and most versatile agricultural land; it has not considered the financial impact on individual holdings as this does not expressly fall within the remit of the environmental impact assessment. Where the exercise of powers of compulsory acquisition or temporary possession has a detrimental impact on income/profit the affected party will be entitled to compensation, under the compensation code.</p> <p>As described in ES Appendix 12.1, Tunnel Arisings Management Strategy [APP-285], Section 4, Table 4-5, alternative locations in the vicinity of the Scheme have been considered for the placement of tunnel arisings, including the land to the south of Parsonage Down (part of the Guinness Estate) and the land to the east of Parsonage Down (owned by Mr Moore). Each site has been assessed on the basis of a range of criteria. As is also explained in the Summary of Impacts in Table 4-7, a significant part of the land east of Parsonage Down would already be required to provide essential landscape mitigation, the achievement of which would also involve the use and placement of the tunnel arisings, and this, alongside other factors, contributed to the conclusion that the land east of Parsonage Down would be the most suitable site for placement of the remainder of the tunnel arisings.</p> <p>As noted in section 5.3.11 of the Statement of Reasons [APP-023], should the private landowner elect to retain the land in its changed condition following deposition of the excavated material, the Applicant's powers of compulsory acquisition would not be implemented in respect of that land.</p>	
<p>The summary of impacts is comparatively deficient in regard to the land south of Parsonage Down, as opposed</p>	<p>The summary of impacts in Table 4-7 of the Environmental Statement (ES) Appendix 12.1, Tunnel Arisings Management Strategy [APP-285], provides a high-level overview of the findings of the full comparative assessment set out in Section 4, Table 4-5. As can be seen from Tables 4-5 and 4-6, a full assessment of each of the potential on-site options was</p>	<p>RR-2240</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>to the assessment given to the land owned by Mr Moore, which indicates that the correct assessment has not been undertaken.</p>	<p>undertaken and the same set of criteria was applied to each of the nine options assessed; as such, it is Highways England's view that, irrespective of the brevity of any text in Table 4-7, the assessment was undertaken on a neutral and verifiable basis.</p>	
<p>At examination there should be time spent on exploring and comparing the arguments between the taking of land owned by Mr Moore at Parsonage Down, and other sites, as the arguments put forward for each are not consistent in their approach.</p>	<p>The comparative assessment set out in the Environmental Statement (ES), Appendix 12.1, Tunnel Arisings Management Strategy [APP-285], Sections 3 and 4 ('the Strategy') explains the consideration given to potential locations for the placement of tunnel arisings. Section 3 compares the two primary options: placement adjacent to or in the vicinity of the Scheme; and placement 'off-site'.</p> <p>Having identified on-site placement as the preferred disposal method in Section 3, Section 4 of the Strategy sets out a comparative analysis of nine on-site options (see Table 4-5 – Comparative assessment of potential on-site locations), including the land to the south of Parsonage Down and the land to the east of Parsonage Down (the latter being owned by Mr Moore).</p> <p>Each of the on-site options was assessed comparatively on the basis of the following criteria: air quality and noise, biodiversity, cultural heritage, land use, landscape and visual impacts, and operational viability. In respect of the latter criterion, the assessment takes into account the fact that a significant part of the land east of Parsonage Down would already be required for essential landscape mitigation. The assessment concluded that the land east of Parsonage Down would be the most suitable for placement of the remainder of the tunnel arisings.</p>	RR-2240
<p>The applicant to date has not sought to negotiate for the land and rights required for the Scheme. Requirements under Government Circular 06/04 have not been met.</p>	<p>Highways England has engaged with all affected landowners and occupiers with a view to acquiring their land interest by agreement, initially by writing to them to inform them of Highways England's willingness to negotiate to acquire land by agreement for the purposes of the Scheme, and to invite dialogue on this point. As a result, Highways England is in the process of engaging with all affected landowners and occupiers with regard to the acquisition of their land interest by agreement; and negotiations to this end will be ongoing throughout the DCO process.</p>	RR-2240

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>At the time of the submission of the application, the status of such negotiations was set out in Annex B of the Statement of Reasons [APP-023]). Highways England is aware of the requirement (in paragraph 25 of the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land', DCLG, September 2013) to seek to acquire land by negotiation wherever practicable, and understands that the power to acquire land compulsorily should only be exercised if attempts to acquire by agreement fail. Further information on Highways England's case for compulsory acquisition, including in respect of negotiations, can be found in the Statement of Reasons, see in particular Chapter 5 (regarding the case for compulsory acquisition) and section 5.7 which relates to acquisition by agreement.</p>	
<p>How has the DCO got so far when there are still gaps and important decisions to make, such as groundwater monitoring during and post construction?</p>	<p>As set out in the Environmental Statement (ES) Chapter 11, Road Drainage and the Water Environment [APP-049], Section 11.9, the assessment shows no significant changes to hydrology, surface water quality or groundwater quality during either the construction or operational phases of the scheme. The assessment was informed by a comprehensive programme of water feature surveys, which included face-to-face meetings with landowners and abstraction licence owners, and borehole monitoring. ES Appendix 11.4, Groundwater Risk Assessment [APP-282], outlines the results of installed monitoring boreholes. Table 7.1 of ES Appendix 11.4 also outlines the proposed programme for monitoring including during and post construction. During the assessment, there was extensive engagement with the Environment Agency and Wiltshire Council.</p> <p>During construction, the contractor will be required to comply with the Outline Environmental Management Plan (OEMP) [APP-187], which is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020] and which sets out general and topic-specific principles and requirements for the control, mitigation and monitoring of potential construction impacts, including in relation to the protection of private water supplies, hydrology, land drainage, and sewage disposal from construction compounds (see the OEMP, references MW-WAT1 – MW-WAT15). Through the OEMP the contractor will also be required to develop a Groundwater Management Plan (GMP) (MW-WAT10) outlining how groundwater resources are to be protected in a consistent and integrated manner. The GMP will be developed in consultation with the Environment Agency.</p>	<p>RR-2288, RR-2303, RR-2134, RR-2201, RR-2088, RR-2220</p>
<p>Highways England is unwilling</p>	<p>Highways England, as the Scheme promoter, is responsible for ensuring that groundwater</p>	<p>RR-2288, RR-2303,</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>to agree an alternative supply should water supply be compromised.</p>	<p>resources, including the supply and quality of groundwater, are protected during the construction and operation of the Scheme. Potential impacts on water supplies will be mitigated through the implementation of measures included within the Outline Environmental Management Plan (OEMP) [APP-187] (at references PW-WAT1 and WAT2, and MW-WAT1, WAT2, WAT3, WAT4, WAT5, WAT6, WAT7, WAT9, WAT10, WAT14, and WAT15), which is secured through paragraph 4 of Schedule 2 to the draft Development Consent order [APP-020].</p> <p>As set out in the Environmental Statement, Chapter 11, Road Drainage and the Water Environment [APP-049], Section 11.9, the assessment shows no significant changes to hydrology, private water supply, surface water quality or groundwater quality (water supply) during either the construction or operational phases of the Scheme. Highways England has been working with, and will continue to work with, Wessex Water and other statutory utility providers as required to ensure that water supplies are protected during the construction and operation of the Scheme.</p>	<p>RR-2201, RR-2088, RR-2220</p>
<p>The Scheme will result in the formation of small/irregularly shaped land parcels which will be impractical to farm commercially.</p>	<p>Accommodation work discussions have begun with affected landowners and occupiers, and Highways England will continue to engage with landowners in order to seek to reduce the impacts of severance on farming activities. If this is unachievable, however, there may be an entitlement to compensation for severance, for example where the resultant shape of the retained field parcels, or associated access restrictions, were to restrict the use of the land, for instance by making future farming operations difficult or impractical.</p>	<p>RR-1980</p>
<p>There will need to be discussions with Highways England about how agricultural and landowner access will be maintained on the affected part of the WHS and how suitable access to Stonehenge Cottages will be ensured.</p>	<p>Private means of access to land and premises affected by the Scheme (both within the WHS and beyond it) will be retained wherever possible; alternatively, proposals for replacement accesses will be developed and agreed with the affected landowner (and any other relevant parties).</p> <p>In the case of the Stonehenge Cottages, the Scheme includes provision for replacement private means of access via the lengths of Stonehenge Road and the new restricted byway (replacing the old A303) which are shown as references 23, 24 and 25 on the Rights of Way and Access Plans [APP-009], on Sheet 8, and which are described in Schedule 3 to the draft Development Consent Order (DCO) [APP-020]. Article 10 of the draft DCO [APP-020] provides that Highways England must not stop up private means of access unless or until a</p>	

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>permanent replacement means of access has been provided, or, prior to that permanent replacement being provided, a temporary alternative means of access has been made available. Where accesses are not dealt with in this way, there may be an entitlement to compensation.</p> <p>The access arrangements over the restricted byway will be managed by the highways authority to ensure only those with private means of access rights are able to use mechanically propelled vehicles on the restricted byway.</p>	
<p>Despite writing draft proposals for agreement documents, no response has been received and therefore the asset owner cannot proceed.</p>	<p>Highways England will continue to discuss and agree with affected utility owners and affected landowners the extent of any necessary protection or diversion of affected plant/apparatus. Provisions for managing the interaction between the Scheme and utility assets are provided for in the protective provisions within Schedule 11 to the draft DCO [APP-020] submitted with the application.</p>	<p>RR-1726</p>

14 Public Rights of Way

14.1 Overview

14.1.1 A total of 90 interested parties raised matters regarding Public Rights of Way (PRoW) of the scheme in their relevant representations.

14.1.2 Table 14-1 provides a summary of the key issues raised in relation to PRoW, alongside a response from Highways England.

Table 14-1: Public Rights of Way

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Public rights of way (PRoW) need to be inclusive for disabled access.	<p>Where existing topographical constraints allow, there will be disabled access to all new public rights of way (PRoW) proposed along the Scheme.</p> <p>Where new routes are constructed on hilly terrain, the gradient will be the minimum available within the Scheme limits. This means that some routes steeper than the standard 5% maximum will be introduced in the Scheme. For example, the bridleway alongside the existing A303 between Winterbourne Stoke and the new link to Longbarrow junction has a maximum gradient of 10% and an average of 6.6% over 450m.</p>	RR-1485, RR-1610, RR-1731, RR-1834
All new public rights of way should be high quality and fit-for-purpose for cyclists/horse riders/carriages where appropriate.	All the new public rights of way (PRoW) proposed along the length of the Scheme would be constructed in a way that will make them fit for all the uses permitted by their designated status. Exact cross-sectional details and construction materials would be determined as part of the Scheme's detailed design process and would be sensitive to the landscapes through which the rights of way would pass.	RR-0380, RR-0733, RR-0809, RR-1429, RR-0894, RR-1009, RR-1100, RR-0873, RR-2329, RR-2237, RR-1980
More information is requested on the fencing and gating strategy for the new PRoWs.	The detail of the fencing and gating strategy for the PRoWs will follow at the detailed design stage if development consent for the Scheme is granted. At this stage it is envisaged that fences along public rights of way would be provided to prevent access onto private land, grazed grassland or the highway, or to provide a buffer zone to the retained cutting between Longbarrow junction and the western tunnel entrance. Where necessary for adjacent land use, appropriate	RR-1100, RR-1918, RR-1977, RR-1980, RR-1594, RR-1586, RR-1542, RR-1583, RR-2109

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>stock-proof netting would be added to strained wire or other boundary treatment provided by way of accommodation works, as agreed between Highways England and the adjacent landowner. Indicative details are available in Series 3 of the Highway Construction Details, Manual of Contract Documents for Highway Works http://www.standardsforhighways.co.uk/ha/standards/mchw/vol3/section1/h_series.pdf. Some of these details may be modified within the World Heritage Site.</p>	
<p>Remove the public right of way from Green Bridge No. 1 and move it to the north side of A303 between Green Bridge No. 1 and the B3083.</p>	<p>Routing the right of way over Green Bridge No. 1 is preferred because the alternative via the B3083 would be a 1.3km longer detour for users of Byway SLAN3 seeking to cross the A303 and avoid the existing crossing at Yarnbury.</p>	<p>RR-1046, RR-1043</p>
<p>Make sure the existing A303 through the WHS is closed off to mechanically propelled vehicles (MPVs).</p>	<p>Except for occasional farm and utility vehicles gaining access to adjacent farmland and services, no motor vehicles would be permitted on the former A303 through the WHS, which would become a restricted byway. A key objective of the Scheme is the removal of the sights and sounds of traffic from within the WHS. Opening the downgraded A303 within the WHS to MPVs would be contrary to this objective.</p>	<p>RR-0260, RR-1844</p>
<p>Make sure the existing A303 through the WHS is available for MPVs, or at least the section between byways AMES11 and AMES12; otherwise the link between Byways 12 and 11 must be in place.</p>	<p>Byway 11 will terminate where it currently joins the existing A303, which will be converted into a restricted byway. This will prevent vehicles from using the route of the old A303 between Byways 11 and 12 in close proximity to Stonehenge to the detriment of the monument's setting. No link for mechanically-propelled vehicles (MPV) between Byways 11 and 12 has been proposed further south of the A303 as it would have an adverse impact on the adjacent Normanton Down barrow group and on the tranquillity of the WHS at this location. MPVs seeking access between Byways 11 and 12 will use the public highway network. Non-motorised users will be able to link between Byways 11 and 12 via the new restricted byway being created along the route of the old A303 through the WHS. Currently, MPV users of Byways 11 and 12 are not permitted to make right turns onto the A303 from those byways or onto those byways from the A303.</p>	<p>RR-0262, RR-0852, RR-1532, RR-1741, RR-1907</p>
<p>The proposed alterations to the ProWs reduce connectivity in the area.</p>	<p>The new public rights of way measures proposed along the Scheme would not only maintain, but would also considerably enhance the existing PRoW network, significantly improving connectivity for non-motorised users, as illustrated on the Rights of Way and Access Plans [APP-009].</p>	<p>RR-0733, RR-1429, RR-1592, RR-1741, RR-2214</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Maintain access to byway BSJA3 from A303 i.e. keep junction open or turn the current proposed bridleway running parallel and south of the A303 between SLAN3 and Winterbourne Stoke into a BOAT.	Motorised access from BSJA3 to the new A303 will be via the old A303 through Winterbourne Stoke and the new Longbarrow junction. The proposed restricted byway between BSJA3 and SLAN3 is not being created as a BOAT because that would also allow vehicles from Winterbourne Stoke and Berwick St James to use the route to access the A303 westbound via a sub-standard access point. This would lead to increased turning movements where SLAN3 joins the A303 and hazardous conflicts between slow and fast-moving traffic.	RR-2214, RR-1977, RR-2109
Create a new bridleway between Cholderton and Allington Track.	A new bridleway in this location is not necessary to integrate the Scheme into the wider public rights of way network and so is beyond the proposed scope of the Scheme. The provision of new bridleway in this location would be a matter for Wiltshire Council to consider.	RR-0733
The new PRoW between Winterbourne Stoke and Longbarrow junction is unnecessary.	The new PRoW between Winterbourne Stoke and Longbarrow junction will be of significant benefit to local people, encouraging walking and cycling, and adding to the amenity of the area. It will connect these users, as well as equestrians, to the new public rights of way proposed within the WHS, providing convenient safe access and the opportunity for the WHS to be explored and enjoyed. Full details are shown on the Rights of Way and Access Plans [APP-009] and are described in Schedule 3 to the draft DCO [APP-020].	RR-2108, RR-2354, RR-1606, RR-2345
Move the proposed bridleway along the northern side of existing A303 between Winterbourne Stoke and Longbarrow junction to the southern side.	The proposed bridleway between Winterbourne Stoke and Longbarrow junction is better located on the north side of the old A303, separated from the existing road by an existing mature hedge along part of the route. The alternative route on the south side would mean the removal of an area of woodland and would involve additional earthworks.	RR-2108, RR-2354, RR-1606, RR-2345
The PRoW north of Green Bridge No. 4 should continue to the Stonehenge visitor centre.	The new restricted byway running northwards from Green Bridge No. 4 will continue to the Stonehenge visitor centre. See sheets 5 and 14 of the Rights of Way and Access Plans [APP-009].	RR-0380
Do not create lots of new byways.	Highways England wish to ensure that the Scheme is integrated within the existing byway network and, where the opportunity exists, create legacy benefits for non-motorised users in accordance with its Strategic Business Plan and Road Investment Strategy, which are aligned with Government policy to encourage walking, cycling & horse-riding through national and local	RR-1009, RR-1844, RR-2288, RR-2303, RR-2134, RR-2090, RR-2201, RR-2088,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>policies and plans. Details are shown on the Rights of Way and Access Plans [APP-009] and described in Schedule 3 to the draft DCO [APP-020]. This approach aligns with Government policy to encourage cycling and walking (Cycling and Walking Investment Strategy https://www.gov.uk/government/publications/cycling-and-walking-investment-strategy). The proposals would link Yarnbury Castle and Winterbourne Stoke and allow access all the way through the WHS to Amesbury, making it easier for walkers, cyclists and horse riders to access and enjoy the WHS. The majority of the new byways created for these links would be restricted byways not open to the public use of motorised vehicles.</p>	RR-2220
<p>Provide as many byways as possible.</p>	<p>The Scheme is providing a comprehensive set of public rights of way proposals along its length, integrating the Scheme with the existing public rights of way network and enhancing existing provision. Full details are shown on the Rights of Way and Access Plans [APP-009] and are described in Schedule 3 to the draft DCO [APP-020].</p>	RR-0037, RR-0905, RR-1873
<p>Provide public access from Shrewton to existing western access to Stonehenge.</p>	<p>This is outside the scope of the Scheme. General improvements to the wider rights of way network are a matter for Wiltshire Council as the local highway authority.</p>	RR-1615
<p>The NMU connections around Amesbury are not as comprehensive as those in Winterbourne Stoke.</p>	<p>There are limited opportunities to enhance the NMU provision within Amesbury due to limited road space or other available corridors. The new public rights of way proposals around Amesbury are appropriately designed to accommodate and enhance the existing network. A particular benefit for residents of Amesbury will be that walkers, cyclists and horse riders will be able to gain easy, safe access to the WHS via Stonehenge Road, and via the new restricted byway along the line of the existing A303.</p>	RR-1429
<p>Motorcycle access should be provided for PRowS along the Scheme as this will be safer.</p>	<p>The new public rights of way proposals along the Scheme align with Government policy to encourage walking and cycling and are not intended for use by motorised vehicles. The exception is where private means of access are required for motorised vehicles and where no suitable highway route exists as a result of the removal of the existing A303 through the WHS. Motorised vehicles, including motorcycles, will have the benefit of using the existing Byways Open to All Traffic and a safer highway network relieved of congestion.</p>	RR-0642, RR-0844
<p>Public access needs to be controlled.</p>	<p>The detail of the fencing and gating strategy for the PRowS will follow at the detailed design stage if development consent for the Scheme is granted. At this stage it is envisaged that fences along public rights of way would be provided to prevent access onto private land, grazed grassland or the highway, or to provide a buffer zone to the retained cutting between Longbarrow</p>	RR-0036, RR-1977, RR-1980

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>junction and the western tunnel entrance. Where necessary for adjacent land use, appropriate stock-proof netting would be added to strained wire or other fence by way of accommodation works, agreed between Highways England and the adjacent landowner. Indicative details are available in Series 3 of the Highway Construction Details, Manual of Contract Documents for Highway Works http://www.standardsforhighways.co.uk/ha/standards/mchw/vol3/section1/h_series.pdf. Some of these details may be modified within the World Heritage Site.</p>	
<p>MPV access to the new restricted byways and bridleways needs to be defined and controlled.</p>	<p>Highways England wish to ensure that the Scheme is integrated within the existing byway network and, where the opportunity exists, create legacy benefits for non-motorised users in accordance with its Strategic Business Plan and Roads Investment Strategy, which are aligned with Government policy to encourage walking, cycling & horse-riding through national and local policies and plans. A number of new and diverted public rights of way (PRoW) are proposed as part of the Scheme. Some of these are byways but most are not proposed to be open to public use by mechanically propelled vehicles (MPV). The designation of each existing and proposed PRoW was clarified at Supplementary Consultation as one of:</p> <ol style="list-style-type: none"> (1) Byway (open to all traffic) (2) Restricted Byway (Non-motorised users only) (3) Bridleway (Pedestrians, Cyclists and equestrians) (4) Footpath (Pedestrians) <p>Byways open to all traffic are only proposed when access is required for motorised vehicles and where no suitable highway route exists. Appropriate gates and fencing would be developed as part of the detailed design to prevent motorised vehicles accessing the non-motorised public rights of way, where appropriate. Extensive new public rights of way for non-motorised users, where MPV access would be prohibited, are proposed within the Scheme as shown on the Rights of Way and Access Plans [APP-009].</p>	<p>RR-1844, RR-1742</p>
<p>The track above Scotland Lodge Farm to Berwick St James (BSJA3) and stretch of downgraded A303 from Winterbourne Stoke should be retained for farm access.</p>	<p>The BSJA3 track above Scotland Lodge towards Berwick St James will remain open as it is today. The stretch of downgraded A303 west of Winterbourne Stoke to the junction of the BSJA3 will be a byway open to all traffic which farm vehicles will be able to use.</p>	<p>RR-1977</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>Existing byways and access to them should remain as they currently are. Extinguishing rights of way does not comply with s.136(1) of the Planning Act 2008.</p>	<p>Highways England wish to ensure that the Scheme is integrated within the existing byway network and, where the opportunity exists, create legacy benefits for non-motorised users in accordance with its Strategic Business Plan and Road Investment Strategy, which are aligned with Government policy to encourage walking, cycling & horse-riding through national and local policies and plans. The Planning Act 2008 s.136(1) specifies that an order granting development consent may extinguish a public right of way over land only if the Secretary of State is satisfied that –</p> <p>An alternative right of way has been or will be provided, or</p> <p>The provision of an alternative right of way is not required</p> <p>Article 10 of the draft DCO [APP-020] would, if the DCO is made in the form applied for, authorise the extinguishment, and replacement, of the public rights of way listed in Schedule 3 and shown on the Rights of Way and Access Plans [APP-009]. In respect of public rights of way, Schedule 3 is divided into two parts. Part 1 of Schedule 3 describes the public rights of way which are to be stopped up (extinguished) in column (2) and for which an alternative right of way is to be provided, which are described in column (4), as well as new public rights of way which are otherwise to be provided. Article 10(2) of the draft DCO requires Highways England to provide either the permanent replacement right of way specified in column (4) of Part 1, or a temporary replacement pending completion of the permanent replacement right of way, before the corresponding right of way described in column (2) of Part 1 is permanently extinguished. It follows then that the Secretary of State can be satisfied that the condition in section 136(1)(a) is satisfied in respect of the extinguishment of rights of way listed in Part 1 of Schedule 3 to the draft DCO, if it was made.</p> <p>Part 2 of Schedule 3 lists the rights of way which are to be extinguished and for which no substitute is to be provided. Article 10(3) of the draft DCO would authorise the extinguishment without substitution of these rights of way only if one of the conditions in paragraph (4) are satisfied, which ensure that no private access is required from the right of way to be extinguished. In each case where paragraph (4) applies, the changed circumstances which would arise if the Scheme was implemented are such that the part of the public right of way in question, which is to be stopped up, would no longer be required. The Secretary of State can be satisfied that the requirement in section 136(1)(b) is met by the Scheme.</p>	<p>RR-0003, RR-0059, RR-0185, RR-0272, RR-0856, RR-1303, RR-1416, RR-1610, RR-0905, RR-0904, RR-0910, RR-0901, RR-0900, RR-0912, RR-0908, RR-0909, RR-0913, RR-1001, RR-1039, RR-1042, RR-1034, RR-1060, RR-1907, RR-1884, RR-1651, RR-2031, RR-1742, RR-2152, RR-1976, RR-2221, RR-2086</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Downgrade byways 12 and 11 so that MPVs can't use them.	Highways England wish to ensure that the Scheme is integrated within the existing byway network and, where the opportunity exists, create legacy benefits for non-motorised users in accordance with its Strategic Business Plan and Roads Investment Strategy, which are aligned with Government policy to encourage walking, cycling & horse-riding through national and local policies and plans. It is not necessary to change the status of byways AMES 11 and AMES 12 to integrate the Scheme in to the network. Changing the status of the existing BOATs is beyond the scope of the Scheme and is a matter for Wiltshire Council to consider as the local highway authority.	RR-1844, RR-2329
Use the old B3086 northern section as a byway past the Stonehenge visitor centre.	The B3086 will remain as a public road and thus cannot be downgraded to a byway. A new restricted byway will be provided alongside the A360 (north) from Longbarrow junction to the visitor centre. Details can be found in the Rights of Way and Access Plans, Sheet 14 [APP-009].	RR-0380
Support for the proposed opportunities for improving the ProW network along the Scheme.	Thank you for your support.	RR-0380, RR-1429, RR-1742
Fit for purpose surfacing on any new farm access roads is needed.	The surfaces of new agricultural accesses will be determined in consultation with affected landowners and tenants as appropriate. These discussions will continue in parallel with the Examination of the DCO application for development consent for the Scheme.	RR-1977, RR-1980, RR-2237
The byways through the WHS are historically important.	The importance of the byway network in the WHS is recognised. The Scheme's public rights of way proposals will enhance the network for walkers, cyclists, carriages and horse riders, enabling them to access and enjoy the WHS. The Scheme's public rights of way proposals are shown on the Rights of Way and Access Plans [APP-009].	RR-0262, RR-1485, RR-0911, RR-0902, RR-0909, RR-1042, RR-1741, RR-1907, RR-1905, RR-2152, RR-2221
Early engagement with cycling representatives is recommended.	Following previous engagement during the non-statutory consultation on the Scheme, the outputs of which informed elements of the development of the Scheme design, a workshop was held on 24 July 2018. This was attended by representatives of Cycling UK, local cycling clubs and others with an interest in cycle routes, including: Cycling Opportunities Groups for Salisbury (COGS), Rights of Way and Countryside Manager, Wiltshire Council Senior Rights of Way Warden, Wiltshire Council Councillor, Amesbury Town Council Chair, Parish Council and The National Trust. The Ramblers, Wiltshire Bridleway Association and SUSTRANS were invited but	RR-1429

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	were unable to attend. For further information please refer to the Consultation Report, Paragraphs 3.11.3 and 3.11.4 [APP-026].	
If BOATs in the WHS are downgraded, all traffic in the WHS should be stopped.	The existing BOATs, AMES11 and AMES12, in the WHS are not being downgraded as part of this Scheme, see sheets 6 and 7 of the Rights of Way and Access Plans [APP-009]. Changing the status of the existing BOATs is beyond the scope of the Scheme and is a matter for Wiltshire Council to consider as the local highway authority. However, the conversion of the existing A303 into a restricted byway will prevent vehicles from using the route of the old A303 between Byways 11 and 12 in close proximity to Stonehenge to the detriment of the monument's setting. No link for mechanically-propelled vehicles (MPV) between Byways 11 and 12 has been proposed further south of the A303 as it would have an adverse impact on the adjacent Normanton Down barrow group and on the tranquillity of the WHS at this location. MPVs seeking access between Byways 11 and 12 will use the public highway network. Non-motorised users will be able to link between Byways 11 and 12 via the new restricted byway being created along the route of the old A303 through the WHS.	RR-0092, RR-1844
The A344 should be a bridleway or restricted byway.	It is not necessary to create a new bridleway or restricted byway along the alignment of the former A344 in order to integrate the Scheme into the surrounding public rights of way network. The designation of the old A344 does not form part of the scope of this Scheme.	RR-1803
Make sure safety for NMUs is considered.	Ensuring the safety of non-motorised users (NMUs) has been paramount in developing the Scheme proposals and will continue to be so as the design details are further developed and finalised. Fencing would be provided as required to segregate NMUs from vehicular traffic. The Scheme preliminary design has been subjected to a Road Safety Audit (RSA), the recommendations of which have been implemented without exception. The Scheme would be subject to further RSAs at completion of the design, prior to opening to traffic and following a period of operation. These RSAs would consider the safety of NMUs as well as other users of the Scheme.	RR-1429
There can be no dead-end byways as a result of the scheme.	Highways England does not accept the general proposition that for a way to be a highway it must be connected to other highways at both ends. There is no rule of law which compels the conclusion that a cul-de-sac can never be a highway, see for example Roberts v Webster [1968] 1 WLUK 455; 66 L.G.R. 298. Notwithstanding that clarification, the Scheme will not create any cul-de-sac byways.	RR-0003, RR-0898, RR-0905, RR-0909, RR-1907

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>The existing A303 currently acts as a link for motorised vehicles between the byways open to all traffic AMES11 and AMES12. The Scheme proposes the removal of approximately 5.91 kilometres of the existing A303 (shown on sheets 4 to 8 inclusive of the Rights of Way and Access Plans [APP-009]) to be replaced by the new and improved A303, shown on sheets 2 to 9 inclusive and sheet 11 of the Rights of Way and Access Plans. AMES 11 and AMES 12 will remain byways open to all traffic (including motorised vehicles). However, along the line of what will be the former A303, from the existing Longbarrow roundabout (sheet 5 of the Rights of Way and Access Plans [APP-009]) to part way along the existing Stonehenge Road, the Scheme proposes a new restricted byway (references IB, I and J shown on sheets 5 to 8 inclusive of the Rights of Way and Access Plans). Motorised vehicles will not be permitted to join the former A303 from BOAT AMES11 (byway 11), as the new restricted byway will only be available to cyclists, pedestrians, equestrians and horse-drawn carriages. Not providing public vehicular rights along the new restricted byway is consistent with the Scheme's aim of removing the sight and sound of traffic from the vicinity of Stonehenge and the historic landscape of the World Heritage Site.</p>	
<p>Consideration should be given to the recent enquiries regarding the designation of existing byways in the WHS - they should not be downgraded.</p>	<p>Consideration has been given to the recent enquiries regarding the designation of the existing byways through the World Heritage Site. As such, the designation of byways AMES11 and AMES12 will not change as part of this Scheme. Changing the status of the existing BOATs is beyond the scope of the Scheme and is a matter for Wiltshire Council to consider as the local highway authority.</p>	<p>RR-1485, RR-1610, RR-1834, RR-1907</p>
<p>There should be no fencing along the existing A303 PRoW through the WHS.</p>	<p>The detailed design of public rights of way, including fencing, will follow in due course if development consent for the Scheme is granted. At this stage it is envisaged that where necessary, fencing along the old A303 through the WHS will be retained or replaced to ensure: a) users of the new restricted byway (on the line of the old A303) cannot access adjacent private land, b) non-pedestrian users cannot enter open access land, and c) to provide a buffer zone to the western section of the new road in cutting.</p>	<p>RR-0859</p>
<p>The needs of motorised user groups are not being considered.</p>	<p>The needs of motorised user groups have been considered in the formulation of the Scheme's proposals. No byways open to all traffic (BOATs) are being removed and a new BOAT on the line of the old A303 to the west of Winterbourne Stoke is included in the Scheme to provide a connection between Winterbourne Stoke and the existing bridleway BSJA3, which is proposed to be converted into a BOAT, to link up with the existing BOATs BSJA3 and BSJA3A (as shown on</p>	<p>RR-0642, RR-0643, RR-0844, RR-0852, RR-0895, RR-1741</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>Sheets 2 and 3 of the Rights of Way and Access Plans [APP-009]. The only proposed change is in the WHS where Byway 11 will no longer provide a through route via the A303, because the old A303 will become a restricted byway (available to non-motorised users only) in support of the aim to remove the sight and sound of traffic from the World Heritage Site landscape. The previously proposed link between Byways 11 and 12 to the south of the old A303 has been removed because it would have had adverse heritage impacts. This change was part of the supplementary consultation reported in Chapter 6, para 6.15.1 of the Consultation Report [APP-026].</p>	
<p>Open the existing A303 through the WHS to local traffic.</p>	<p>Keeping the existing A303 open for local traffic would defeat one of the main aims of the Scheme, namely to remove the sight and sound of traffic from the WHS landscape within the WHS.</p>	<p>RR-0003, RR-0406</p>
<p>Downgrade as many existing byways as possible.</p>	<p>The Scheme does not seek to downgrade any byways. As the responsible authority, Wiltshire Council has a duty to maintain existing public rights of way; any requests for their downgrading should be directed to the Council.</p>	<p>RR-0092, RR-1844, RR-2178</p>
<p>The link between byways 11 and 12 was a good idea.</p>	<p>The previously proposed link to the south of the existing A303 between byways 12 and 11 was removed from the Scheme proposals. This change to the Scheme proposals, presented for statutory consultation, was one of three changes put forward for supplementary consultation, the feedback from which is summarised in Chapter 6 of the Consultation Report [APP-026]. The change was made because the link would have had an adverse impact on the adjacent Normanton Down barrow group and on the tranquillity of the WHS at this location. Non-motorised users will be able to travel between byways 11 and 12 via the old A303, which will become a new restricted byway between the other two byways that are already existing.</p>	<p>RR-0852, RR-1741, RR-1907</p>
<p>Good management of the byways is critical to avoid damage to the environment.</p>	<p>Management and maintenance of the proposed new public rights of way is expected to pass to Wiltshire Council as the responsible highway authority.</p>	<p>RR-1977, RR-1980</p>
<p>There is a lack of clear information as to what will happen to the section of the de-trunked road from Old Stonehenge Road in an easterly direction and where</p>	<p>The section of Stonehenge Road from its junction with the A303 in a generally south-easterly direction to its junction with footpath AMES 13 would be converted to a restricted byway. Private means of access rights would be provided for Stonehenge Cottages and adjacent landowners. The extent of the converted Stonehenge Road is shown on the Rights of Way and Access Plans [APP-009] hatched as 'new right of way and new private means of access and is also labelled on those Plans as part of the new restricted byway, reference J.</p>	<p>RR-1588, RR-2237</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
the de-trunked section will start.		
Where will restrictions for private means of access start from on the stretch of downgraded A303 west of Winterbourne Stoke, and will this be restricted?	<p>The section of downgraded A303 west of Winterbourne Stoke to its junction with the existing bridleway BSJA3 will become a byway open to all traffic (BOAT) which farm vehicles will be able to use without restriction. The new BOAT will continue to the point where it connects with existing BOAT BSJA3 which runs south-eastwards from the existing A303 towards Berwick St. James. To the west of the BSJA3, a new restricted byway will continue on the south side of the improved A303 to connect with the existing BOAT SLAN3. This new section of restricted byway between BSJA3 and SLAN3 will also accommodate a private means of access for the adjacent landholder.</p> <p>Refer to Sheets 1 and 2 of the Rights of Way and Access Plans [APP-009] and the corresponding descriptions in Schedule 3 to the draft DCO [APP-020].</p>	RR-1046, RR-1043
WST06 crosses open fields and the River Till by means of a historic bridge and is wholly inappropriate as a byway.	The Scheme is maintaining the continuity of byways WST06A and WST06B via Green Bridge No.2. Any review of its designated status and use would be a matter for Wiltshire Council as the responsible authority for the byways.	RR-2108, RR-2354, RR-1606, RR-2345
The PRoW east of Winterbourne Stoke along the existing A303 should start further west at the junction of the A303 with byway WST04.	Between its junction with byway WST04 and the start of the new segregated bridleway, the existing A303 will have a 30mph speed limit and, as such, will be safe for use by horse riders alongside motorists. While the precise proposals in this area will be confirmed during the detailed design process if development consent for the Scheme is granted, it is envisaged that pedestrians and cyclists will use a shared path along this section of the old A303 before joining the new bridleway (shown as reference 'Z' on Sheet 4 of the Rights of Way and Access Plans [APP-009]. In addition, the existing bridge over the River Till is too narrow to allow the segregated bridleway to extend westwards into the village of Winterbourne Stoke. Refer to Sheet 4 of the Rights of Way and Access Plans [APP-009].	RR-0859
The PRoW east of Winterbourne Stoke along the existing A303 should have a separate footbridge over the River Till.	With the Scheme in place, the existing (old) A303 would principally be used only by low levels of local traffic accessing Winterbourne Stoke, Berwick St James and Shrewton. Consequently, the construction of a new, separate footbridge over the River Till is not proposed as part of the Scheme. However, there will be provision over the existing River Till bridge for shared pedestrian and cycle use.	RR-0859

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>The closure of BOATs is unacceptable.</p>	<p>BOATs are only proposed to be stopped up at their existing junctions with the A303, for justified reasons. BOATs AMES1 and AMES2, east of Solstice Park, are being stopped up to remove unsafe access to and from the A303. Within the WHS, access for motorised vehicles on the route of the old A303 will be prohibited: motorised vehicles will still be able to use Byways 11 and 12, but will not be able to use the route of the existing A303 between them, which will be converted to a restricted byway to avoid vehicles continuing to pass in close proximity to Stonehenge. Walkers, cyclists, horse riders and horse-drawn carriages using Byway 11 will still be able to join the route of the old A303 once it has become a restricted byway. Motorised users of the byways have alternative routes available to them via the public highway network.</p>	<p>RR-0262, RR-1485, RR-0878, RR-1782</p>
<p>Improve the safety of pedestrians, other non-vehicular users and residents living on the B390 in Chitterne.</p>	<p>The consideration of such issues on the B390 in Chitterne is beyond the scope of the Scheme and is a matter for Wiltshire Council as the responsible highway authority.</p>	<p>RR-1546</p>
<p>The conversion of AMES1 byway to a public footpath north of the new AMES1 - Allington Track link road alignment makes no sense. It would create a dead-end footpath next to the busy A303 and an almost undistinguishable tumuli which contains a badger sett. Historic England prefer to discourage the public from visiting such sites due to the potential damage caused. Highways England should reconsider the need for this as it provides no benefit to their scheme. It was also under-represented within the</p>	<p>The proposed footpath, labelled reference P on sheet 11 of the Rights of Way and Access Plans [APP-009] and described in Schedule 3 to the draft DCO [APP-020], will replace part of the existing AMES1, byway open to all traffic, with a public footpath. The footpath will be of benefit to local people, by maintaining pedestrian access. The junction of AMES1 with the A303 will be closed to vehicular traffic, protecting the monument from further degradation and improving safety on the existing A303. Highways England is of the firm view that its pre-application consultation on its proposals for reference P were appropriate and proportionate and are clearly shown on page 9 of the Supplementary Consultation Booklet (see Appendix J1 [APP-036]) to the Consultation Report) on which it consulted in July 2018. Further information on the Supplementary Consultation can be found in section 6 of the Consultation Report [APP-026].</p> <p>As the proposed footpath is a route which already has public access it is not likely that there would be any increase in disturbance to badger setts in the environs as a result of the proposed change. The existing roadside vegetation is likely to discourage users from leaving the path.</p>	<p>RR-1542</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
consultation material. Instead of making it a footpath, use the money to provide display boards for the nearby tumuli.		
The creation of new BOATs and upgrading existing PRowS to BOATs should not be permitted.	<p>The Scheme maintains the existing byway network and, where possible, improves connectivity through the World Heritage Site and between Amesbury and Yarnbury Castle. It provides alternative routes parallel to the new dual carriageway.</p> <p>There are three proposed BOATS included in the Scheme:</p> <ol style="list-style-type: none"> 1. BSJA3: Existing part of A303 to be downgraded from trunk road to BOAT status and linked with the BSJA3 south of A303. Existing BSJA3 will be changed from a bridleway to a BOAT to match its existing usage and linked with the downgraded part of the A303. 2. WSTO6B: Re-aligned BOAT due to new A303 and the new Green Bridge No. 2. 3. AMES1: Existing byway AMES1 to be stopped up. AMES1 from the south to be connected with Equinox Drive. <p>Full details of the public rights of way proposals, including the small number of modifications being made to the existing network, are shown on the Rights of Way and Access Plans [APP-009].</p>	RR-1742
Objection to the position of the new restricted byway running north/south from Longbarrow roundabout to connect to byway BSJA11. Divert the new byway so that it runs south of the new A303 to the newly formed junction and then in a south easterly direction to run parallel with the realigned A360.	The new restricted byway proposed adjacent to the A360, from the existing Longbarrow roundabout to byway BSJA11, provides a continuous link to the proposed byways adjacent to the A360 north and the A303 east. This connection utilises the existing A360 carriageway and follows a non-motorised user desire line for north to south movements and vice versa.	RR-1980
Proposals to add to and widen the existing network of public	The Planning Act 2008 established a regime for the consenting of nationally significant infrastructure projects. The regime is intended to operate as a 'one stop shop' for major	RR-2108, RR-2354, RR-1606, RR-2109,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>rights of way in the area should (unless directly affected by proposed engineering works) be heard and evaluated on their merits through normal rights of way protocols and not attached to central governmental infrastructure schemes.</p>	<p>infrastructure projects to avoid multiple concurrent public processes. This enables all of the issues engaged by projects to be examined in a holistic fashion. It is entirely proper that the changes to the public rights of way network comprised in the Scheme are examined in the context of the wider Scheme of which they form a part and not in isolation.</p>	<p>RR-2345</p>
<p>As many cyclists may like to visit the area of the stones at Stonehenge, somewhere to park and lock a bicycle nearby should also be considered.</p>	<p>Highways England is taking the opportunity to create legacy benefits for non-motorised users in accordance with its Strategic Business Plan and Road Investment Strategy, which are aligned with Government policy to encourage walking, cycling and horse-riding through national and local policies and plans.</p> <p>The new public rights of way measures proposed along the Scheme will considerably enhance the existing Public Rights of Way (PRoW) network (including the conversion of part of the existing A303 in the World Heritage Site to a restricted byway), significantly improving connectivity for non-motorised users. The Scheme's PRoW proposals are shown on the Rights of Way and Access Plans [APP-009].</p> <p>Cycle parking facilities are already available at the Stonehenge Visitor Centre and the provision of any additional facilities outside the Scheme boundaries would be for others to consider and would be subject to the appropriate planning requirements.</p>	<p>RR-0260</p>
<p>In general, family friendly cycling facilities should be provided, which will help to reduce the volume of traffic using surrounding minor roads.</p>	<p>The Scheme would provide a comprehensive set of public rights of way proposals along its length as shown on the Rights of Way and Access Plans [APP-009] and described in Schedule 3 to the draft DCO [APP-020]. The detailed design of the public rights of way would follow if consent for the Scheme is granted.</p>	<p>RR-0260</p>

15 Tunnel

15.1 Overview

- 15.1.1 A total of 214 interested parties raised matters regarding the tunnel element of the scheme in their relevant representations.
- 15.1.2 Table 15-1 provides a summary of the key issues raised in relation to the tunnel alongside a response from Highways England.

Table 15-1: Tunnel

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
The western tunnel entrance should be moved west, outside the WHS.	Western extensions of the tunnel were considered by the applicant during the Scheme development. The options were ruled out because of topographical and technical constraints, and because they would not deliver sufficient benefits to justify the additional cost.	RR-0008, RR-0306, RR-0486, RR-0839, RR-0846, RR-1326, RR-1844, RR-2004, RR-2006, RR-2329
Improve the look of the western tunnel entrance.	The final appearance of the western (and eastern) tunnel portals will be designed so as to be sensitive to the WHS landscape setting. If development consent for the Scheme is granted, the detailed design will be carried out with reference to the principles of Highways England's guide 'The Road to Good Design'. Further information can be found in the Design and Access Statement [APP-295].	RR-1844
Move the tunnel away from Stonehenge.	The tunnel route does not pass under Stonehenge and would be farther away from Stonehenge than the existing A303. The tunnel portals have been optimally located adjacent to the existing road, having regard to known archaeology and topography, and there would be no benefit in routing the tunnel farther south.	RR-0163, RR-0121, RR-0478, RR-0615, RR-0552, RR-1237, RR-1264, RR-1457, RR-1775, RR-1963, RR-2005
Make the tunnel deeper.	The tunnel cannot be made substantially deeper without increasing the depth of excavations at the tunnel portals and the tunnel approaches, affecting the continuing road alignment eastwards and westwards. The depth and vertical alignment of the tunnel balances a number	RR-0180, RR-0230, RR-0509, RR-0552, RR-0829, RR-1861

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	of considerations: the minimum cover required for the tunnel boring machine at the portals; the maximum safe gradient for traffic; the minimum ground cover at the low point of the tunnel (Stonehenge Bottom); and the seasonal variation in groundwater level.	
Make the tunnel shallower.	It is not possible to make the tunnel shallower. The tunnel depth is defined by a combination of: the alignment of the road at either end; the minimum ground cover required for the tunnel at the portals for the tunnel boring machine; and existing topography over the length of the tunnel, including at Stonehenge Bottom.	RR-0306
How will the risk of fire in the tunnel be mitigated?	The tunnel will have a range of fire-fighting safety features which will be developed in liaison with Dorset and Wiltshire Fire & Rescue Service. This is likely to include incident detection systems; a fixed fire-fighting system; fire mains and hydrant points. Regular cross passages for evacuation (as included in the Scheme design); and a ventilation system (as required by the OEMP [APP-187] will also aid in dealing with fires.	RR-1954
What is the procedure if there's an incident (fire / accident/ breakdown) in the tunnel?	<p>Highways England has been working with the Emergency Services throughout the design of the Scheme. Representatives from the Emergency Services have played an important role at the Tunnel Design Safety and Consultation Group (TDSCG) meetings to help shape key aspects of the Scheme's design and operational requirements. The Emergency Services have been involved in many aspects of the design which include identifying appropriate emergency response plans that will need to be developed during the detailed design to address potential incidents within the tunnel and on the road. They have also supported the Scheme through their input to safety and design assessments that have informed the initial development of the Scheme. The engagement will continue through the detailed design, the construction and the operational stages of the Scheme.</p> <p>The tunnel will include a range of design features to meet the safety requirements of relevant tunnel design codes and to support an effective response to incidents, as explained in section 6.2.3 of the Design and Access Statement [APP-295]. Should an incident necessitate the closure of one bore, a local diversion route for traffic will be implemented via the A360/The Packway via Larkhill/A345.</p>	RR-2150
How will the emergency services get into the tunnel?	Highways England has been working with the Emergency Services throughout the design of the Scheme. Representatives from the Emergency Services have played an important role at the Tunnel Design Safety and Consultation Group (TDSCG) meetings to help shape key	RR-0066, RR-2243

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>aspects of the Scheme's design and operational requirements. The Emergency Services have been involved in many aspects of the design which include identifying appropriate emergency response plans that will need to be developed during the detailed design to address potential incidents within the tunnel and on the road. They have also supported the Scheme through their input to safety and design assessments that have informed the initial development of the Scheme. The engagement will continue through the detailed design, the construction and the operation stages of the Scheme.</p> <p>In the event of an incident requiring the attendance of the emergency services, it will be possible to close either one or both carriageways of the new A303 between the Longbarrow and Countess junctions. This will allow the emergency services to gain access from either end of the tunnel, to one or both bores as needed, depending on the nature of the incident. To assist with emergency services access, vehicle crossovers and parking laybys will be provided at each end of the tunnel as noted in Section 6.2.3 of the Design and Access Statement [APP-295]. Full contingency plans will be in place to ensure there is speedy and effective response by the emergency services should the need arise.</p>	
<p>Concerns about the impacts of large HGVs unable to use the tunnel and therefore rerouting via local roads. Improvements to these roads will be required.</p>	<p>All HGVs will be able to use the tunnel except for abnormal high loads. Records indicate that there are approximately two abnormal vehicles registered per year as using the A303 which would be restricted from using the tunnel. No abnormal height vehicles were recorded during surveys of the local road network undertaken for this project. Please refer to Paragraphs 6.15.4 to 6.15.8 of the Transport Assessment [APP-297], which considers the very occasional forecast use of these diversion routes by abnormal height vehicles.</p>	<p>RR-1063, RR-1918, RR-1963, RR-2370</p>
<p>Reduced speed limits should be applied within the tunnel.</p>	<p>The Scheme has been designed in accordance with current highway design standards; consequently, the tunnel will be designed to operate at the national speed limit. The safety features installed within the tunnel are not related to the speed of vehicles but are related to the volume of traffic and applicable safety standards. The installed lane control systems will also be able to display reduced speed limits in the tunnel if needed, e.g. to manage a vehicle breakdown. The speed limits for the Scheme are shown on the Traffic Regulation Measures Plans (Speed Limits) [APP-013] and described in Part 1 of Schedule 10 to the draft DCO [APP-020].</p>	<p>RR-0721</p>
<p>Move the eastern tunnel</p>	<p>Movement of the eastern portal to the west (shorter tunnel) is restricted by the Avenue. The Avenue is an ancient ceremonial route and the portal has been positioned east of the Avenue</p>	<p>RR-2004, RR-2006,</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
entrance west.	<p>to avoid severing it with the approach road. Keeping the position of the Eastern Portal in the location identified at the Preferred Route Announcement (PRA) would enhance the WHS by enabling the reconnection of the Avenue where it is currently severed by the existing A303. If the portal were to be moved west, then this opportunity could not be realised.</p> <p>With respect to the location of the eastern portal within or close to the WHS boundary, UNESCO/ICOMOS in their 2018 mission report recognised that <i>“the eastern portal has been positioned in the least impactful location available close to the WHS boundary, given the constraints imposed by the attributes of the WHS, other significant sites in the vicinity, and local topographic and environmental conditions”</i>.</p>	RR-2235, RR-2353
Move the eastern tunnel entrance east.	<p>The location of the eastern portal is heavily constrained by topography and by features such as the Avenue to the west, A303 to the South, Nile Clumps and a power pylon to the north and by Blick Mead and Countess junction (of the A303 with the A345) to the east. No viable option has been identified for any significant change to the location identified in the PRA. However, a cut-and-cover extension of 85m has been added to suit topography for improvement in landscape and visual connectivity and tranquillity within the WHS.</p> <p>Any movement of the eastern portal to the east (longer tunnel) would impact the scheduled Vespasian's Camp Iron Age hillfort and the nationally important Mesolithic site of Blick Mead with adverse impacts on heritage assets, as well as landscape and visual, biodiversity and ground water. Increasing the length of the tunnel would also make the scheme poor value for money. It would also become impractical in terms of accommodating improvement of the Countess junction between the A303 and A345 if the tunnel was to extend further.</p>	RR-2235
The proposal for a tunnel will do damage to sensitive archaeological sites.	<p>The preferred route of the Scheme was carefully chosen to minimise effects on archaeology, and a comprehensive programme of archaeological evaluation surveys has informed the Scheme being designed in a way that has limited any direct physical impacts on archaeology as far as practicable. Examples of how the design has been developed to limit these impacts on archaeology include, but are not limited to, the design and placement of the western and eastern tunnel portals and portal approaches. Further information can be found in the Assessment of Alternatives, in the Environmental Statement (ES), at Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9. The cultural heritage assessment, reported in ES Chapter 6, identifies the effects on known archaeological features</p>	RR-0337, RR-0535, RR-0431, RR-1383, RR-1441, RR-1459, RR-1521, RR-1525, RR-1891, RR-2294, RR-2007, RR-1947

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>whilst recognising the benefits that the tunnel will deliver for the WHS. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction. The Outline Archaeological Mitigation Strategy (OAMS) (Appendix 6.11 of the ES [APP-220]) outlines the principles of archaeological mitigation and also identifies areas to be protected in situ. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and Heritage Monitoring Advisory Group and its implementation is secured by paragraph 5 of Schedule 2 to the draft Development Consent Order [APP-020].</p>	
<p>Will hazardous goods vehicles be permitted to use the tunnel?</p>	<p>The tunnel will be classified in accordance with the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009. As an "A" category tunnel, Highways England does not at this stage propose to impose specific prohibitions on the transport of dangerous goods. This is the case with other tunnels on the Strategic Road Network such as the A3 Hindhead tunnel, with the tunnel's design, safety systems and operational procedures reflecting such use. Part 4 of Schedule 8 to the draft DCO [APP-020] includes byelaws for regulating access and traffic within the tunnel area. Byelaw 8 prohibits motor vehicles carrying dangerous goods from entering the tunnel area without the consent of Highways England. Paragraph (4) allows Highways England to grant a general consent to the use of the tunnel by vehicles carrying categories or descriptions of dangerous goods, which must be maintained on a website together with a mechanism for obtaining Highways England's specific consent. It is Highways England's intention to formulate an appropriate general consent, consistent with its approach to the carriage of dangerous goods on the Strategic Highway Network, in due course. Byelaw 8 is necessary to enable Highways England to appropriately regulate the carriage of dangerous goods through the tunnel area.</p>	<p>RR-1063</p>
<p>I don't like the vertical retaining walls or cutting – it will create a new and permanent severance.</p>	<p>The deep cutting is proposed to hide the sight of traffic from views within the WHS and to accommodate the vertical alignment needed to take the road into the tunnel. Vertical retaining walls have been chosen to minimise the road's footprint within the WHS. The provision of vertical retaining walls is secured by reference D-CH5 in the Outline Environmental Management Plan [APP-187] which is secured by paragraph 4 of Schedule 2 of the draft DCO [APP-020].</p> <p>The WHS is currently entirely severed by the A303 and the cutting will not create any new severance. The proposed tunnel would reconnect the two halves of the WHS, which are</p>	<p>RR-0839</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	currently severed by the surface road, greatly improving connectivity into and across the WHS landscape. Severance is further reduced, and connectivity further improved through the provision of Green Bridge No. 4 and the creation of new and enhanced public rights of way included within the Scheme.	
How will vibration during tunnelling affect archaeology?	The potential for impacts on archaeology is set out in the Environmental Statement (ES), Chapter 6, Cultural Heritage [APP-044] which includes consideration of the mitigation embedded within the bored tunnel design and the assumptions taken into account, which lead to an avoidance of direct physical impacts on archaeology. An Outline Archaeological Mitigation Strategy (OAMS) (Appendix 6.11 of the ES [APP-220]) outlines the principles of archaeological mitigation and also identifies areas to be protected in situ, including the placement of ground movement monitoring stations above the line of the tunnel. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and Heritage Monitoring Advisory Group and its implementation is secured by paragraph 5 of Schedule 2 to the draft Development Consent Order [APP-020]. The DAMS will include measures for monitoring ground movement and vibration and for appropriate mitigation measures to be put in place, in the tunnel, to minimise as far as reasonably practicable vibration and settlement impacts on archaeological remains.	RR-0700, RR-1339, RR-1597, RR-1766, RR-1829, RR-1816, RR-1879, RR-2341, RR-2005, RR-2195, RR-2348, RR2372AS
Concerns about local traffic impacts for vehicles that cannot use the tunnel; NMUs and other prohibited vehicles.	The only motorised vehicles that will be prohibited from using the tunnel are: abnormally high-sided vehicles and motorcycles <50cc. The restriction on motorcycles with an engine capacity below 50 cubic centimetres is described in Part 2 of Schedule 10 to the draft DCO [APP-020] and shown on sheets 4, 5, 6, 7, 8 and 9 of the Traffic Regulation Measures Plans (Clearways and Prohibitions) [APP-014]. Standard design guidance for the UK strategic road network, DMRB Volume 6, TD 27/05, has been followed and this is to provide clearance of 5.03m for vehicles using the tunnel. The local diversion route for high load vehicles will be A360/B3086/The Packway/Solstice Park junction. The number of vehicles that will regularly divert is low [APP-297], section 6.15 and far outweighed by the forecast reduction in traffic using the Packway (forecast to reduce by over 4000 vehicles per day by 2041 [APP-297], Section 6.3.13. Non-motorised users will be able to use the new byways being created along the route of the old A303 between Amesbury and Winterbourne Stoke, conveniently, with greater amenity, and more safely. The new byways are shown on the Rights of Way and Access Plans [APP-009] and described in Schedule 3 to the draft DCO [APP-020].	RR-0733, RR-1063, RR-1918, RR-1963

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Wouldn't a bypass be better suited in the area than a tunnel?	Surface solutions for a bypass outside the WHS would be too damaging in terms of their impact on the countryside and the environment and would not be effective in delivering the Scheme's objectives. Within the WHS, non-tunnel solutions are also unviable - they would cause damage to the OUV of the WHS and would be conflicting with the World Heritage Convention as well as national and local planning policies. It would therefore be unlikely that such solutions would receive development consent. Further information on the many alternative options appraised can be found in the Technical Appraisal report https://highwaysengland.citizenspace.com/cip/a303-stonehenge/	RR-0447, RR-0714, RR-0743
Objection to the tunnel: it is an unnecessary waste of money and will generate more traffic at the expense of the environment and heritage.	The tunnel solution has emerged from exhaustive studies of alternative options as the best solution to address the problems of traffic congestion on the A303 and to deliver the Scheme's objectives. The cost of the Scheme is justified by the extensive economic, environmental, heritage and social benefits that the Scheme would bring, including providing a free-flowing route to the South West (accommodating traffic now and in the future), removing the sight and sound of traffic from much of the WHS landscape, and relieving local communities of rat running traffic. Detailed information regarding the Scheme objectives and the environmental and heritage benefits which would flow from the achievement of those objectives is set out in the Case for the Scheme and NPS Accordance [APP-294] and in the Environmental Statement, Chapter 3 - Assessment of alternatives [APP-041]. Further information on the many alternative options appraised can be found in the Technical Appraisal report https://highwaysengland.citizenspace.com/cip/a303-stonehenge/ .	RR-0079, RR-0332, RR-0322, RR-0493, RR-0624, RR-0637, RR-0722, RR-0794, RR-1377, RR-1376, RR-1258, RR-1365, RR-1385, RR-1380, RR-1532, RR-1521, RR-1534, RR-1430, RR-1031, RR-1137, RR-1131, RR-0878, RR-0892, RR-1619, RR-1616, RR-1909, RR-1728, RR-1903, RR-1781, RR-1900, RR-2350, RR-2347, RR-2332, RR-2170, RR-2333
The tunnel should minimise (or eliminate) lighting, minimise light pollution and preserve dark skies.	The tunnel will be lit internally, but there will not be any lighting along the open road inside or outside the WHS. This will reduce light pollution in the WHS and will help to preserve the dark sky environment throughout the year. The Outline Environmental Management Plan [APP-187], compliance with which is secured by requirement 4 of Schedule 2 to the draft DCO [APP-020], contains the following actions/commitments:	RR-2004, RR-2006

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>D-CH9 – tunnel portal lighting will be designed to minimise light spill outside of the portals' footprint;</p> <p>D-CH11 – no road lighting of the Scheme during operation except under Green Bridge No.4 and Countess Junction;</p> <p>D-CH12 – existing lighting units at Countess Roundabout shall be replaced to minimise light spill.</p>	
<p>Soften the appearance of the walls by planting them with vegetation.</p>	<p>A wholly vegetated wall would require greater depth and, consequently, greater land take within the WHS. Whilst the exact nature of retaining walls will be confirmed in detailed design, the design will give consideration to visual appearance, maintenance and noise reduction.</p> <p>The Outline Environmental Management Plan [APP-187], compliance with which is secured by requirement 4 of Schedule 2 to the draft DCO [APP-020] includes the following action/commitment under reference D-CH5:</p> <p><i>“The new A303 within the WHS western approach shall be in cutting to a minimum of 7m depth with vertical retaining walls. Approximately 2.5m of the top of each side of the cutting shall be formed of grassed slopes at approximately 1 in 2.”</i></p>	<p>RR-1646</p>
<p>The tunnel will be unguarded. Has the potential for terrorism been appropriately risk assessed?</p>	<p>Yes. Highways England has been working closely with the emergency services on the design of the tunnel and its future operation. This includes contingency planning arrangements for any foreseeable scenario that could unfold in the future, as is Highways England's standard practice for protecting and maintaining parts of the network where there is sensitive infrastructure. The potential for the Scheme to be vulnerable to major incidents and disasters, including terrorism, is considered through the assessment of major events, as set out in the Environmental Statement, in section 4.6 of Chapter 4, Environmental Assessment Methodology [APP-042].</p>	<p>RR-1758, RR-1954</p>
<p>The western portal should move west.</p>	<p>Western extensions of the tunnel were considered by the applicant during the scheme development. The options were ruled out because of topographical and technical constraints, and because they would not deliver sufficient additional benefits, or reduced impacts, to justify the additional cost.</p>	<p>RR-2114, RR-1957, RR-2353</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>The proposed tunnel length is too short.</p>	<p>Along with considerations of cost, the location and design of the tunnel portals have been optimised in terms of the natural topography of the area, impact within the WHS and the extent of benefit that will be secured by one of the key aims of the scheme which is to remove the sight and sound of the A303 traffic from much of the WHS landscape. With accompanying mitigation, the assessments show that the preferred solution is a 2-miles (3.3km) long tunnel extending between portals located adjacent to the existing A303 to the east of The Avenue and to the west of Normanton Down.</p> <p>The Preferred Route Announcement (PRA) by the Secretary of State in September 2017 was based on a 2.9km long twin bored tunnel. The western portal was located south of existing A303 and northwest of Normanton Gorse and eastern portal to the north of A303 and east of the Avenue. Since the PRA, during the Scheme development, and in response to consultation responses, the applicant has amended the scheme to extend the tunnel. Two changes were made to the location of the western portal which resulted in a 300m extension to the tunnel:</p> <ul style="list-style-type: none"> • the end of the bored tunnel was moved 100m west to avoid impact on a scheduled barrow (NHLE No. 1010832 – Bowl barrow south of the A303 and north west of Normanton Gorse) that contributes to the OUV of the WHS; and • a 200m cut-and-cover extension, or canopy, was added for improvement in landscape and visual connectivity and tranquillity within the WHS. <p>At the eastern end a cut-and-cover extension of 85m has been added to suit topography for improvement in landscape and visual connectivity and tranquillity within the WHS.</p> <p>Further westwards extensions of the tunnel were ruled out because of topographical and technical constraints, and because they would not deliver sufficient additional benefits to justify the additional cost.</p>	<p>RR-0116, RR-0336, RR-0388, RR-0433, RR-0499, RR-1352, RR-1521, RR-1731, RR-1722, RR-2268, RR-1896</p>
<p>Concerns regarding chalk stability with changing groundwater levels and</p>	<p>Changing groundwater levels are considered in the Environmental Statement (ES) Chapter 11, Road Drainage and the Water Environment [APP-049], and ES Appendix 11.4, together with its Annex 1 - Numerical Model Report [APP-282], in which Figure 3.9 (labelled 1.3 on Page 20 of</p>	<p>RR-0201, RR-0306, RR-1063, RR-1658</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>potential impact on Stonehenge.</p>	<p>49) shows that groundwater levels are well below ground level (minimum around 10m) at Stonehenge at approximate chainage 8500m. Changes to groundwater levels are illustrated in Figure 4.1 which shows a rise of 0.5m at peak (flood) groundwater conditions in the Stonehenge area. Figure 4.6 shows a rise of 0.2m for average summer low conditions (0.2m) and Figure 4.11 shows no change under drought conditions. Figure 4.1 also shows the typical seasonal range of groundwater levels of between 4-6m and a greater range under peak conditions.</p> <p>The assessment [APP-049 and appendices] demonstrate that there is a natural fluctuation in groundwater levels which is greater than any predicted changes. No settlement as a result of changes in groundwater level fluctuations will therefore occur.</p> <p>Further information on stability generally can be found in the Land Instability Risk Assessment [APP-278] which assesses tunnelling induced ground settlement and demonstrates that the Stonehenge Monument falls well outside the 1mm settlement contour used to delineate the zone affected by the works.</p>	
<p>What is the likelihood of tunnel closure and what will the traffic impact be on the local road network?</p>	<p>The new dual carriageway will be safer and more resilient than the existing single carriageway, leading to fewer incidents and less disruption to the local road network when incidents do happen. The twin-bore tunnel has been designed to allow one bore to be used for two way traffic should the other bore be unavailable at certain times during maintenance works. In the very rare event of an incident happening that creates the need for both bores to be closed at the same time, the local diversion route would be via the A345/The Packway/B3086/A360. Where one tunnel bore is closed due to an incident, traffic will be diverted in a similar manner.</p>	<p>RR-0802, RR-1898, RR-1963</p>
<p>The western tunnel entrance will be a visual intrusion on the WHS.</p>	<p>The visual intrusion of the western portal has been minimised by the portal's careful positioning and design, the addition of a grassed-over canopy and the road being placed in an 8 metre deep cutting. Proposed Green Bridge No.4 was widened to approximately 150m to provide greater physical and visual connectivity between the northern and southern parts of the WHS, including between the Winterbourne Stoke Crossroads Barrows and the Diamond Group in this western part of the WHS. Further information can be found in the Environmental Statement, Chapter 6 Cultural Heritage [APP-044] section 6.8, paragraph 6.8.5, and Chapter 7 Landscape and Visual [APP-045] section 7.8, and Table 7.5.</p>	<p>RR-1844, RR-1947</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>How will suicides be prevented if there is a large cut in the ground?</p>	<p>Fences will be provided to prevent unsafe access. The design of any safety fencing installed within or in the vicinity of the WHS will need to be sensitive to its setting. The Outline Environmental Management Plan (OEMP) [APP-187] at reference D-CH14, compliance with which is secured by requirement 4 of Schedule 2 to the draft DCO [APP-020], requires Highways England to develop the detail of fencing within the WHS in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council.</p>	<p>RR-1758, RR-1918</p>
<p>A longer tunnel is required to extend beyond the boundaries of WHS.</p>	<p>Along with considerations of cost, the location and design of the tunnel portals have been optimised in terms of the natural topography of the area, impact within the WHS and the extent of benefit that will be secured by one of the key aims of the scheme which is to remove the sight and sound of the A303 traffic from much of the WHS landscape. With accompanying mitigation, the assessments show that the preferred solution is a 2-miles (3.3km) long tunnel extending between portals located adjacent to the existing A303 to the east of The Avenue and to the west of Normanton Down.</p> <p>The Preferred Route Announcement (PRA) by the Secretary of State in September 2017 was based on a 2.9km long twin bored tunnel. The western portal was located south of existing A303 and northwest of Normanton Gorse and eastern portal to the north of A303 and east of the Avenue. Since the PRA, during the Scheme development, and in response to consultation responses, the applicant has amended the scheme to extend the tunnel. Two changes were made to the location of the western portal which resulted in a 300m extension to the tunnel:</p> <ul style="list-style-type: none"> • the end of the bored tunnel was moved 100m west to avoid impact on a scheduled barrow (NHLE No. 1010832 – Bowl barrow south of the A303 and north west of Normanton Gorse) that contributes to the OUV of the WHS; and • a 200m cut-and-cover extension, or canopy, was added for improvement in landscape and visual connectivity and tranquillity within the WHS. <p>At the eastern end a cut-and-cover extension of 85m has been added to suit topography for improvement in landscape and visual connectivity and tranquillity within the WHS.</p> <p>Further westwards extensions of the tunnel were ruled out because of topographical and</p>	<p>RR-0016, RR-0008, RR-0019, RR-0309, RR-0242, RR-0166, RR-0142, RR-0181, RR-0323, RR-0266, RR-0280, RR-0230, RR-0182, RR-0452, RR-0528, RR-0486, RR-0504, RR-0509, RR-0439, RR-0463, RR-0507, RR-0632, RR-0679, RR-0721, RR-0682, RR-0778, RR-0791, RR-0839, RR-0829, RR-0815, RR-0846, RR-1150, RR-1288, RR-1278, RR-1374, RR-1317, RR-1258, RR-1312, RR-1532, RR-0932, RR-1000, RR-1019, RR-1026, RR-1052, RR-1088, RR-1089, RR-0870, RR-1564, RR-1402, RR-1633, RR-1772, RR-1803, RR-1754, RR-2022,</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	technical constraints, and because they would not deliver sufficient additional benefits to justify the additional cost.	RR-1982, RR-2069, RR-2249, RR-2063, RR-2006, RR-1951, RR-1861, RR-2200, RR-2129, RR-2048, RR-2202, RR-2353, RR-2370
This is nothing short of vandalism.	The Scheme has been developed from an exhaustive appraisal of options (detailed in the Technical Appraisal report https://highwaysengland.citizenspace.com/cip/a303-stonehenge/) as the most appropriate solution for delivering (a) the Government's strategy to upgrade the A303 to a high quality dual carriageway, and (b) the objectives set for the Scheme. The Scheme will remove the damaging effect that the existing road has on the WHS landscape, and the tunnel will bring extensive benefits for the WHS, as set out in the Case for the Scheme and NPS Accordance [APP-294] and the Environmental Statement [APP-038 – APP-292] accompanying the DCO application.	RR-0102, RR-0267, RR-0195, RR-0202, RR-0317, RR-0116, RR-0178, RR-0073, RR-0433, RR-0478, RR-0386, RR-0520, RR-0431, RR-0641, RR-1227, RR-1366, RR-1204, RR-1213, RR-1175, RR-1469, RR-1492, RR-1448, RR-0968, RR-1029, RR-1055, RR-1075, RR-1088, RR-1094, RR-1590, RR-1823, RR-1839, RR-1692, RR-2223, RR-1775, RR-0426, RR-2018, RR-2156, RR-2164, RR-2034, RR-2044, RR-2078, RR-2112, RR-2016, RR-2003, RR-1619, RR-2117, RR-2334
Extend the western tunnel	Within the WHS, the western portal has been positioned at the head of a dry valley in the	RR-0846, RR-2329

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
entrance canopy over all or more of the cutting.	landscape to hide it from view as much as possible. The location and design of the western tunnel portal / canopy has been optimised in terms of its impact within the WHS, the extent of benefit that will be secured by the removal of the existing A303 and the cost of the tunnel. Further extension of the canopy westwards would not deliver sufficient additional benefits to justify the additional cost.	
Concerns regarding the visual impact of the western tunnel entrance and deep cutting on the surface of the WHS and the local agriculture. Impact should be minimised.	<p>By adopting the vertical retaining wall option, the western tunnel portal and approach cutting have been designed to minimise the Scheme's footprint in the WHS and its visual impact. This approach to the Scheme design will also serve to minimise the impact of the Scheme on local agricultural land.</p> <p>The Outline Environmental Management Plan (OEMP) [APP-187], compliance with which is secured by requirement 4 in paragraph 4 of Schedule 2 to the draft DCO [APP-020], includes the following action/commitment under reference D-CH5:</p> <p><i>“The new A303 within the WHS western approach shall be in cutting to a minimum of 7m depth with vertical retaining walls. Approximately 2.5m of the top of each side of the cutting shall be formed of grassed slopes at approximately 1 in 2.”</i></p>	RR-1954
Concerns about light pollution at the tunnel portals.	<p>There will not be any lighting along the open road inside or outside the WHS. The tunnel portals will not be lit outside the tunnel. Lighting will only commence inside the tunnel. Further information on the lighting proposals can be found in the Environmental Statement, in Chapter 2, The Proposed Scheme, in paragraphs 2.3.50 – 2.3.52 [APP-040].</p> <p>The Outline Environmental Management Plan [APP-187] includes measures to limit operational lighting including:</p> <ul style="list-style-type: none"> • D-CH9 – tunnel portal lighting will be designed to minimise light spill outside of the portals' footprint; • D-CH11 – no road lighting of the Scheme during operation except under Green Bridge Four and Countess Junction; • D-CH12 – existing lighting units at Countess Roundabout shall be replaced to minimise light spill. 	RR-0242, RR-0721, RR-1963, RR-2047

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>Compliance with the Outline Environmental Management Plan is secured by requirement 4 in Schedule 2 to the draft DCO [APP-020].</p>	
<p>Tunnel Arisings Management Strategy does not offer any agricultural justification to support the compulsory acquisition of the area proposed for deposition of the arisings. Highways England has not been forthcoming with this information which implies no justification exists or has been prepared.</p>	<p>The loss of agricultural land has been included as a criterion for assessing the options for management of tunnel arisings, as set out in the Environmental Statement, Appendix 12.1, Tunnel Arisings Management Strategy, [APP-285], both for off-site alternatives, Section 3, and for sites in the vicinity of the Scheme, Section 4. The assessment takes into account the loss of best and most versatile (BMV) agricultural land, on the basis that whilst restoration to calcareous grassland is understood to be achievable, restoration to BMV status cannot be guaranteed.</p> <p>Proposals for the compulsory acquisition of the land east of Parsonage Down are justified on the basis that at present, whilst it is understood that the land could be restored to calcareous grassland once the excavated material was in place, it cannot be confirmed that the land could be returned to its former agricultural classification. Accordingly, the compulsory acquisition powers are sought to accommodate a scenario in which the landowner no longer wished to retain the land in its changed state. Negotiations with the landowner are ongoing.</p> <p>As stated in section 5.3.11 of the Statement of Reasons [APP-023], "the plots owned by the private landowner are proposed to be subject to powers of compulsory acquisition on the basis that part is required for the permanent construction of the Scheme, whilst the remainder, which is required for the deposition of excavated material, is proposed to be subject to powers of compulsory acquisition in order to provide for the potential situation in which the landowner did not want to retain the land in its changed condition, following deposition of the excavated material.</p> <p>"The Applicant considers this approach to be prudent given that its ability to reinstate the land (which is not required for the permanent construction of the Scheme) to its current arable use following the deposition of excavated material is not yet confirmed.</p> <p><i>"As such, powers of compulsory acquisition are proposed on a contingent basis, to provide for</i></p>	<p>RR-2240</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p><i>a situation in which the private landowner required the Applicant to purchase the land; however, should the private landowner elect to retain the land in its changed condition following deposition of the excavated material, the Applicant's powers of compulsory acquisition would not be implemented in respect of that land."</i></p>	
<p>The comparative assessment of potential sites for the tunnel arisings have ignored the impact that the two options considered suitable would have on the businesses that own the sites.</p>	<p>The comparative assessment, as set out in the Environmental Statement (ES), Appendix 12.1, Tunnel Arisings Management Strategy, [APP-285], both for off-site alternatives, Section 3, and sites in the vicinity of the Scheme, Section 4, includes an assessment of the loss of best and most versatile agricultural land, in accordance with planning policy. The National Networks Policy Statement (NPSNN) requires (at paragraph 5.168) applicants for development consent to <i>"take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and subgrade 3a of the Agricultural Land Classification)"</i>, and advises that <i>"Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality. Applicants should also identify any effects, and seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed"</i>. The requirements in paragraph 5.168 of the NPSNN, and commentary on how those requirements have been complied with in relation to the Scheme, is set out in the Case for the Scheme and NPS Accordance document, Appendix A [APP-294].</p> <p>The comparative assessment set out in the Environmental Statement (ES), Appendix 12.1, Tunnel Arisings Management Strategy, [APP-285] did not take into account the proportion of the various individual agricultural holdings that would be lost if used for the deposition of tunnel arisings, as this criterion does not expressly fall to be considered as part of environmental impact assessment. That said, it is not accepted that one holding would necessarily be rendered non-viable whilst another would not; loss of profit would be covered by statutory financial compensation provisions. Another factor taken into account by Highways England in its comparative assessment of on-site deposition options was that a significant part of the land identified as suitable for the deposition of tunnel arisings to the east of Parsonage Down would be affected by the Scheme in any event, due to it being required for essential landscape mitigation. From an operational perspective, it would be simpler and more efficient to deposit tunnel arisings in a single area rather than splitting the arisings over two separate sites. This factor, in combination with the consideration of other criteria, as set out in the Environmental</p>	<p>RR-2240</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	Statement (ES), Appendix 12.1, Tunnel Arisings Management Strategy [APP-285] also informed the site selection process.	
The location of the eastern tunnel entrance will adversely impact newly-discovered astronomical elements.	Archaeoastronomical aspects are considered in the Heritage Impact Assessment, set out in the Environmental Statement, Chapter 6, Cultural Heritage, Appendix 6.1, Section 6.15 [APP-195] and Annex 5 [APP-200], which highlights the astronomical aspects that contribute to the Outstanding Universal Value of the WHS. These are all considered and assessed in the Heritage Impact Assessment with reference to the Scheme, including the location of the eastern portal and its entrance. With regards to Attribute 4 The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy, the Heritage Impact Assessment concludes that the Scheme would result in a Large Beneficial Effect (ES Chapter 6, Cultural Heritage, Appendix 6.1, paragraphs 9.4.24-9.4.28) [APP-195].	RR-0096, RR-1494, RR-2294

16 Construction and Waste and Materials Management

16.1 Overview

- 16.1.1 A total of 33 interested parties raised matters regarding the construction and waste and materials management aspects of the scheme in their relevant representations.
- 16.1.2 Table 16-1 provides a summary of the key issues raised in relation to the construction and waste and materials management, alongside a response from Highways England.

Table 16-1: Construction and Waste and Materials Management

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Deposit the spoil on Salisbury Plain instead of Parsonage Down.	<p>The comparative assessment set out in the Environmental Statement (ES), Appendix 12.1, Tunnel Arisings Management Strategy [APP-285], Sections 3 and 4 ('the Strategy') explains the consideration given to potential locations for the placement of tunnel arisings. Section 3 compares the two primary options: placement adjacent to or in the vicinity of the Scheme; and placement 'off-site'.</p> <p>Having identified on-site placement as the preferred disposal method in Section 3, Section 4 of the Strategy sets out a comparative analysis of nine on-site options (see Table 4-5 – Comparative assessment of potential on-site locations).</p> <p>Each of the on-site options was assessed comparatively on the basis of the following criteria: air quality and noise, biodiversity, cultural heritage, land use, landscape and visual impacts, and operational viability. In respect of the latter criterion, the assessment takes into account the fact that a significant part of the land east of Parsonage Down would already be required for essential landscape mitigation. The assessment concluded that the land east of Parsonage Down would be the most suitable for placement of the remainder of the tunnel arisings.</p>	RR-1008
Concern about the impacts of the closure of the B3083 during construction on ability	The B3083 will remain open for local traffic throughout the construction period. Relatively minor delays will only be experienced when temporary signal-controlled single lane working is needed, for instance to accommodate the tie-in works between the diverted section of B3083 and the	RR-2343

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
of Winterbourne Stoke residents to access Shrewton.	existing road. The potential for accessibility and connectivity issues for residents of Winterbourne Stoke is considered in ES Chapter 13, People and Communities [APP-051]. The detail of the management of construction traffic will be developed through the development of a Traffic Management Plan, as required by paragraph 9 of Schedule 2 to the draft DCO [APP-020], with details of its content given in the Outline Environmental Management Plan [APP-187], which is secured through paragraph 4 of Schedule 2 to the draft DCO.	
Concerns about the impacts of construction of the Scheme on existing roads in the area e.g. the A36.	The A303 will remain in operation throughout construction and flows on roads are not anticipated to change to any significant degree, as set out in section 9 of the Transport Assessment [APP-297]. Temporary traffic management measures would be put in place to ensure that traffic flows on the existing A303 and other local roads are maintained, whilst allowing safe working at the interface between the existing road network and the Scheme, as stated in ES Chapter 2 [APP-040], paragraph 2.4.29. There would be close liaison with Wiltshire Council to agree how the measures can be best implemented to minimise any disruption through the development of a Traffic Management Plan, as required by paragraph 9 of Schedule 2 of the DCO [APP-020], with details of its content given in the Outline Environmental Management Plan [APP-187] which is secured through paragraph 4 of Schedule 2 to the draft DCO.	RR-0033, RR-0139, RR-0346, RR-0360, RR-0835, RR-0870, RR-1546, RR-1615, RR-1681, RR-1978, RR-1977, RR-1980, RR-1536
Concerns regarding the location and impact of the western compound during construction and plans for after construction.	Construction compounds are temporary construction facilities. Details of the construction compounds are provided in Chapter 2 [APP-040], with the locations shown on the General Arrangement Drawings [APP-012] and indicative layouts shown in ES Figure 2.7 [APP-061]. The potential impacts of the compounds and the activities associated with them will be controlled by measures to limit or avoid dust, noise, spillage and disruption by construction traffic, as set out in the Outline Environmental Management Plan, ES Appendix 2.2 [APP-187], which is secured by paragraph 4 of Schedule 2 of the draft DCO [APP-020]. On completion, the construction compounds, and all other temporary facilities, will be removed and the land reinstated, as required by article 29(4) of the draft DCO.	RR-2025
Concerns regarding the location and impact of the eastern compound during construction and plans for after construction. Concerns that "illustrative" plans likely mean inaccurate.	Construction compounds are temporary construction facilities. Details of the construction compounds are provided in Chapter 2 [APP-040], with the locations shown on the General Arrangement Drawings [APP-012] and indicative layouts shown in ES Figure 2.7 [APP-061]. The potential impacts of the compounds and the activities associated with them will be controlled by measures to limit or avoid dust, noise, spillage and disruption by construction traffic, as set out in the Outline Environmental Management Plan, ES Appendix 2.2 [APP-187], which is secured by paragraph 4 of Schedule 2 of the draft DCO [APP-020]. On completion, the construction	RR-2025, RR-1583

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	compounds, and all other temporary facilities, will be removed and the land reinstated, as required by article 29(4) of the DCO. Once appointed the Scheme's contractor will determine the final layout of the construction compounds but will be constricted by any commitments made by Highways England.	
What are the construction working hours and will they avoid busy periods?	Construction working hours will be dependent on the nature of the construction activity as well as the location of the specific work being carried out, being sensitive to the circumstances and seeking to avoid or minimise disturbance and effects. Details of the approach to be taken can be found in item PW-G4 of table 3.2a of the Outline Environmental Management Plan (OEMP), ES Appendix 2.2 [APP-187] in respect of the preliminary works, and items MW-G12-G14 of table 3.2b of the same document in respect of the main works. Compliance with the OEMP is secured by paragraph 4 of Schedule 2 of the draft DCO [APP-020].	RR-0297, RR-2108, RR-2354, RR-1606, RR-2345
How will environmental impacts be managed during construction?	The Outline Environmental Management Plan (OEMP), ES Appendix 2.2 [APP-187], sets out the range of mitigation measures that will be used to limit or avoid environmental impacts during construction, compliance with which is secured by paragraph 4 of Schedule 2 of the draft DCO [APP-020].	RR-0667, RR-0891, RR-1819, RR-1681, RR-1978
It is unfair and unreasonable that the World Heritage Site stands to gain massively from the Scheme but is completely protected from the construction phase at the expense of local communities.	Planning policy and the Government's commitment to the inscribing of Stonehenge as a world heritage site requires due consideration of the WHS and measures that minimise harm. However, policy also recognises that impacts to local communities need to be managed, as such local communities will be afforded the utmost consideration during the construction phase. The approach to the management, mitigation and monitoring of construction impacts is set out in the Outline Environmental Management Plan (OEMP), Appendix 2.2 of the ES [APP-187], which is secured through paragraph 4 of schedule 2 of the draft DCO [APP-020]. As set out in the OEMP it is envisaged that the Winterbourne Stoke bypass and junctions of the Scheme will be constructed in advance of the tunnel section through the WHS to minimise disruption and secure the accompanying local benefits as soon as possible.	RR-2160
Give the public information on the phases of the construction work, including the impacts of those visiting the WHS.	Information on the phasing of construction work is provided in paragraphs 2.4.5 – 2.4.9 of the Environmental Statement [APP-040]. Further details of construction details will be developed by the appointed contractor during the detailed design phase of the project. During construction, a dedicated Community Relations Manager will keep local residents informed of activities planned and progress being made as part of a range of community engagement measures set out in the Outline Environmental Management Plan (OEMP) Appendix 2.2 of the ES [APP-187]). Compliance with the OEMP is secured under paragraph 4 of Schedule 2 within the draft DCO	RR-1688

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>[APP-020]. The role will include liaison with English Heritage and National Trust for appropriate information to be displayed at the Stonehenge Visitor Centre, explaining the Scheme, progress, any impacts on visitors to the WHS and any mitigations put in place. For the travelling public, Highways England will post regular updates on the Scheme website and also consider other ways of providing information, such as through the development of a mobile app, displays in roadside services and use of variable message signs to indicate travel times.</p>	
<p>How will the tender ensure contractors have site access / use haulage roads, without being traffic bound or affecting local roads? Need information on logistics for construction including the source of materials and transport to and from site.</p>	<p>Chapter 2, The Proposed Scheme [APP-040] of the ES sets out the approach to the construction of the Scheme, including the movement of construction vehicles to and within the site. A haul road will be created within the site for use by construction traffic, separated from traffic on public roads. The appointed contractor will be required to comply with requirements set by the DCO approval, in accordance with the terms of the contract which will contain those requirements, including a Traffic Management Plan (TMP) (as is required by paragraph 9 of Schedule 2 of the draft DCO [APP-020]), against which tenders will be invited. Further information can be found in the Outline Environmental Management Plan (OEMP), Appendix 2.2 of the ES [APP-187]. Specific provisions with respect to the TMP are set out in mitigation measure MW-TRA2 in table 3.2b of the OEMP, compliance with which is secured by paragraph 4 of Schedule 2 of the draft DCO [APP-020].</p>	<p>RR-0413, RR-1864</p>
<p>Will there be provision for security along the route to deter vandalism?</p>	<p>The appointed Contractor will be required to adequately secure the works to guard against vandalism. The measures adopted will take into consideration the environmental constraints and sensitivities of the site. This is secured through the OEMP, where references to the need for such measures are set out at items PW-G5 and PW-CH1 in table 3.2a in respect of the preliminary works, and at items MW-G8, MW-G27 and MW-CH1 of table 3.2b in respect of the main works. Compliance with the Outline Environmental Management Plan is secured by paragraph 4 of Schedule 2 of the draft DCO [APP-020].</p>	<p>RR-1258</p>
<p>Lack of detail about the provision of electrical power and water required during and post- construction.</p>	<p>As detailed in paragraphs 2.4.39-49 of Chapter 2 of the Environmental Statement [APP-040], discussions have been ongoing with the utilities providers (including water and power) regarding the requisite connections for the Scheme. Indicative water and electricity supply routes to the larger compounds are shown in in Figure 2.7A-E of the Environmental Statement [APP-061]. Flexibility is required for utility supplies and diversions to allow for modifications during the detailed design including the influence of constraints such as the avoidance of any archaeological remains (as detailed in item PW-CH6 of Table 3.2a of the Outline Environmental Management Plan (OEMP)) [APP-187]. Compliance with the OEMP is secured through paragraph 4 of</p>	<p>RR-1588</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	schedule 2 of the draft DCO [APP-020].	
Justification of use of Parsonage Down for spoil rather than MOD land.	<p>The comparative assessment set out in the Environmental Statement (ES), Appendix 12.1, Tunnel Arisings Management Strategy [APP-285], Sections 3 and 4 ('the Strategy') explains the consideration given to potential locations for the placement of tunnel arisings. Section 3 compares the two primary options: placement adjacent to or in the vicinity of the Scheme; and placement 'off-site'.</p> <p>Having identified on-site placement as the preferred disposal method in Section 3, Section 4 of the Strategy sets out a comparative analysis of nine on-site options (see Table 4-5 – Comparative assessment of potential on-site locations).</p> <p>Each of the on-site options was assessed comparatively on the basis of the following criteria: air quality and noise, biodiversity, cultural heritage, land use, landscape and visual impacts, and operational viability. In respect of the latter criterion, the assessment takes into account the fact that a significant part of the land east of Parsonage Down would already be required for essential landscape mitigation. The assessment concluded that the land east of Parsonage Down would be the most suitable for placement of the remainder of the tunnel arisings.</p>	RR-1379
There are no details of construction compounds. How will impacts from compounds be mitigated?	Details of the construction compounds are provided in ES Chapter 2 [APP-040], with the locations shown on the General Arrangement Drawings [APP-012] and indicative layouts shown in ES Figure 2.7 [APP-061]. The potential impacts will be mitigated through the implementation of the measures to control dust, noise, spillage and the movement of construction traffic on roads set out in the Outline Environmental Management Plan (OEMP), presented in ES Appendix 2.2 [APP-187], compliance with which is secured by paragraph 4 of Schedule 2 of the draft DCO [APP-020].	RR-1681, RR-1583
The placement of spoil needs to consider the impact on local traffic.	The Scheme has considered the potential for impact on local traffic in the context of tunnel arisings placement. Excavated tunnel arisings would be transported to its deposit location east of Parsonage Down (and thus close to the tunnel construction activities) within the boundary of the Scheme via a haul route created within the construction site. An indicative layout of the haul routes is presented in ES Figure 2.7 [APP-061]. This would keep haul road traffic separate from local traffic. Details are provided in Chapter 2 of the Environmental Statement [APP-040], Section 2.4.17 – 2.4.20.	RR-1008

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>It is intended that the main compound area be sited to the west of the A360 near Longbarrow, with satellite sites at Countess and close to the River Till viaduct. No details are yet available as to how such compounds might be accessed, but the Countess site will likely lie behind Countess Services. The River Till viaduct satellite compound may require access from the B3083; this road is inappropriate as a construction site access from the north (Shrewton), and will likely need to be reinforced at its southern end if used as a haul route from the A303. Wiltshire Council will need to ensure that Highways England remediate any damage to local roads at no cost to the local tax payer. A pre-commencement condition survey of local roads potentially subject to construction traffic use will be a requirement of the Council in relation to any DCO consent.</p>	<p>The comment correctly identifies the locations of the construction compounds. Accompanying details can be found in section 2.4 of ES Chapter 2 [APP-040]. and indicative layouts are shown on ES Figure 2.7 [APP-061].</p> <p><i>Traffic Management Arrangements:</i></p> <p>Details of compound access and egress will be developed as part of the traffic management plan required by paragraph 9 of Schedule 2 of the draft DCO [APP-020] to be developed in consultation with Wiltshire Council. Details of what issues this traffic management plan will deal with are set out in the Outline Environmental Management Plan in ES Appendix 2.2 [APP-187] Items MW-TRA1 to TRA11, which is secured through paragraph 9 of Schedule 2 to the DCO.</p> <p>Highways England continues to discuss the issue of condition surveys and remedial works with Wiltshire Council, and will note the progress of these discussions in the Statement of Common Ground with the Council which will be submitted to the Examination in due course.</p>	<p>RR-0858</p>
<p>What initiatives and incentives will be implemented during</p>	<p>Once appointed, the construction contractor will be required to sign up to the Considerate Constructors Scheme and will be answerable to Highways England in the event of any concerns,</p>	<p>RR-0139</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>construction to encourage behaviour change and reduce the overall burden on the road network?</p>	<p>as set out in the Outline Environmental Management Plan (OEMP) [APP-187] (item MW-G4). They will also be expected to consult with the stakeholders on construction issues identified in the OEMP and consider appropriate measures to mitigate any significant traffic impacts during construction as part of the development of a traffic management plan as required by paragraph 9 of Schedule 2 to the draft DCO [APP-020], with details of its content given in item MW-TRA2 of the Outline Environmental Management Plan [APP-187], compliance with which is secured through paragraph 4 of schedule 2 to the draft DCO.</p>	
<p>Maximise the efficient use of existing infrastructure.</p>	<p>The design of the Scheme has been carefully developed to maximise the use of existing infrastructure. The new Countess Junction, between the A303 and A345 will utilise the existing roundabout, slip roads and lighting albeit with some modifications to comply with the Design Manual for Roads and Bridges (DMRB) and the OEMP (item D-CH12) (compliance with which is required by paragraph 4 of Schedule 2 to the draft DCO [APP-020]. The existing access to the Countess Services would be maintained on the north-east side of the junction. Another example of reuse of existing infrastructure is the existing A303 underpass east of the Eastern Portal. Access to the north end of this underpass is severed by the proposed A303 approach to the tunnel thus rendering the underpass unsuitable for its current purpose. It is proposed that the underpass is retained and modified as a bat hibernation roost, to provide enhancement opportunities for local bat populations.</p>	<p>RR-0839</p>

17 Traffic, Transportation and Operations and Maintenance

17.1 Overview

- 17.1.1 A total of 109 interested parties raised matters regarding traffic and transportation and 25 regarding operations and maintenance of the scheme in their relevant representations.
- 17.1.2 Table 17-1 provides a summary of the key issues raised in relation to traffic, transportation and operations and maintenance, alongside a response from Highways England.

Table 17-1: Traffic, Transportation and Operations and Maintenance

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Additional traffic and higher speeds will mean more accidents.	The new dual carriageway, with grade-separated junctions, would be safer than the existing road and it is therefore projected to result in fewer accidents, as outlined in the Transport Assessment [APP-297] section 7.3. It would remove turning conflicts between through traffic and local traffic, remove congestion and would ease driver frustration. Statistics have also proven that such dual carriageway roads are safer than single carriageways.	RR-0609, RR-0990, RR-2087
Positive comments on traffic impacts.	The Scheme would have a range of positive impacts on traffic, such as improved journey times and reliability along the A303. There would also be improved safety and reduced traffic levels on local roads in the vicinity. Details of the benefits and opportunities offered by the Scheme are detailed in Chapter 5 of the Case for the Scheme, [APP-294].	RR-0407, RR-0543, RR-0689, RR-0839, RR-0877, RR-1742, RR-2230
More traffic modelling information is required.	Details of the traffic modelling are explained in the Transport Assessment [APP-297], and the Combined Modelling and Appraisal Report [APP-298] and accompanying appendices [APP-299 – APP-302]. Sufficient traffic modelling has been carried out in order to assess the traffic impacts of the Scheme.	RR-1008, RR-1918
Concerns regarding the impact on current traffic levels through my village.	The Scheme would remove congestion from the A303 and would relieve local communities of rat running traffic that currently seeks to avoid the congestion on the A303. Further information can be found in the Transport Assessment [APP-297] section 6.3.11 to 6.3.21.	RR-0297, RR-2061
The Scheme will pull traffic from the M4/M5 corridor.	The Scheme will improve journey times along the A303 which will result in some trips rerouting to the A303. Around 1,000 trips per day are forecast to divert from the M4/M5 corridor to the A303 as shown in the Combined Modelling and Appraisal Report Appendix C [APP-301] section	RR-0021, RR-0321

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	5.4.12. This scheme forms part of a programme of improvements to the A303/A358 corridor to provide a high-quality dual carriageway between the South East and the South West, providing a reliable alternative to the M4/M5 corridor. It has been designed to accommodate current and projected traffic growth up to 15 years from the date of opening, in accordance with DfT guidance. Section 6.4 in the Transport Assessment [APP-297] provides further information on corridor capacity.	
There is a need to consider the additional traffic due to army rebasing.	Additional traffic arising from the army rebasing has been fully represented in the traffic forecasts that have been used as the basis of the Scheme's design. Further information can be found in the Transport Assessment [APP-297] section 5.2.14 - 16.	RR-1840
Concerns regarding the impact of the Scheme on rat-running through local villages.	The Scheme will remove congestion from the A303 and will relieve local communities of rat running traffic that currently seeks to avoid the congestion on the A303. Further information can be found in the Transport Assessment [APP-297] section 6.3.11 to 6.3.21.	RR-0272, RR-0560, RR-1840
Concerns regarding the Scheme leading to induced traffic and traffic growth throughout the network.	One of the objectives of the Scheme is to enable growth in jobs and housing by providing a free flowing and reliable connection between the South East and the South West. Achievement of this objective will be associated with an increase in traffic along the corridor. The Scheme appraisal considers the impact of this additional traffic and makes necessary allowance within the design. Further information can be found in Combined Modelling and Appraisal Report Appendix C: Transport Forecasting Package [APP-301], sections 5.3 and 5.4.	RR-0198, RR-0304, RR-0091, RR-0153, RR-0098, RR-0404, RR-0389, RR-0624, RR-0361, RR-0560, RR-0540, RR-0510, RR-0584, RR-0569, RR-0635, RR-0680, RR-0702, RR-0743, RR-0822, RR-1192, RR-1261, RR-1328, RR-1343, RR-1283, RR-1235, RR-1258, RR-1188, RR-1407, RR-1431, RR-1452, RR-1473, RR-0921, RR-1049, RR-1050, RR-0875, RR-1621, RR-1613, RR-1683, RR-1853, RR-1671,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
		RR-1732, RR-1641, RR-1718, RR-1946, RR-2132, RR-1991, RR-2368, RR-1963, RR-2200, RR-2189, RR-1923, RR-2208
Congestion only occurs during the summer and busy periods.	Congestion is at its most severe at weekends and during summer months, but the Scheme would also result in faster journeys throughout the year. Further details can be found in the Transport Assessment [APP-297] section 6.5.7.	RR-1734, RR-1661, RR-2314, RR-2068, RR-2112, RR-2265, RR-1953
Changes are needed to Airman's cross roundabout to discourage rat-running.	The Scheme would relieve communities of rat running traffic that currently seeks to avoid the congestion that arises on the A303. Changes at Airman's Cross roundabout are not needed as part of the Scheme. Further details on the impacts of the Scheme on local roads can be found in the Transport Assessment [APP-297] sections 6.3.11 - 21.	RR-1546
Concerns regarding the diversion route during tunnel closure.	<p>Regular maintenance of the tunnel would be carried out overnight during low traffic flows in one bore of the tunnel at a time. During this activity, the A303 would operate under contra-flow in the other bore which would remain open. The tunnel would only be completely closed (i.e. both bores) in the rare event of an incident happening that requires both bores to be closed at the same time for response activity such as evacuation or significant repair work. In such an event, a series of diversion routes would be put in place. There are several main options for diversion routes. One or more of the options may be implemented depending upon traffic conditions and local circumstances at the time of the diversion:</p> <ul style="list-style-type: none"> - Strategic diversion route - to cater for strategic traffic from outside the region using the M4 and M5; - Regional diversion route - via Salisbury on the A36 and A338, to accommodate traffic in the region and minimise impact on local road network and communities surrounding the tunnel; and - Local diversion route - namely via the A345/The Packway/B3086/A360 as is undertaken at present. This would be used to accommodate local trips and support diversions for those users who are in the immediate vicinity of the tunnel (see section 2.3.64 of the Environmental Statement [APP-040] and Figure 2.6 <i>High Load and Diversionary Route</i> [APP-060]). The detailed design stage and subsequent operational planning will include consideration for how 	RR-0046, RR-1100, RR-1898, RR-1963, RR-1954

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	traffic can be managed across the various diversion routes with the aim to minimise impact on local communities to balance traffic demand across the A303 corridor.	
What is the traffic justification for the Scheme?	The traffic justifications for the Scheme include: (1) currently there are significant levels of congestion experienced on the A303 that can cause a 10 minute journey to increase by up to an hour, leading to extensive rat-running through nearby towns and villages as traffic seeks to avoid the congestion on the A303; (2) Poor connectivity to the South West, causing the region to underperform economically; (3) Winterbourne Stoke and the WHS being severed by a heavily trafficked road; and (4) Safety, which has also been affected by high levels of driver stress and frustration. The Scheme would address all of these issues; further information can be found in the Case for the Scheme, [APP-294] (sections 2.2 and 5.2).	RR-0018, RR-0085, RR-0176, RR-0250, RR-1337, RR-1223, RR-1715, RR-1732, RR-2132, RR-2068, RR-2119
How much extra time will a journey take while the work is ongoing?	Temporary traffic management measures during construction are expected to delay traffic along the A303 by up to five minutes until the Countess flyover and Winterbourne Stoke bypass sections are completed. After that, it is expected that there would be little change in journey times when compared to the current state for the remainder of the construction period. This is set out in the Transport Assessment [APP-297] section 9.	RR-0139
Traffic levels on local roads post implementation of the Scheme should be monitored, and negative impacts remedied.	The Scheme would benefit the local road network by relieving it of high levels of rat running traffic. Highways England routinely monitors Scheme impacts as part of a Post Opening Project Evaluation (https://www.gov.uk/government/collections/post-opening-project-evaluation-pope-of-major-schemes). A monitoring plan would be developed for the Scheme during the detailed design stage. If there are any negative impacts uncovered through such detailed monitoring then potential remedies would be discussed with Wiltshire Council as the responsible highway authority for the local network.	RR-0584, RR-1207, RR-1734
Traffic problems elsewhere in Wiltshire should be fixed instead.	Highways England is responsible for the strategic road network in England (i.e. motorways, trunk roads and the most significant 'A' roads) and this scheme is being progressed, along with other schemes, as part of Highways England's Road Investment Strategy (RIS) (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), to address an identified need to upgrade the A303/ A358 corridor to a high-quality dual carriageway. The resolution of traffic problems on local roads in Wiltshire is a matter for the local highway authority, Wiltshire Council.	RR-0814
Removing views of Stonehenge will improve	Removing views of Stonehenge from the A303 would result in an improvement in journey times on busy days, however the existing junctions and lane merges are also capacity constraints	RR-1741, RR-1715

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
journey times along the A303.	along this section of the A303; see Combined Modelling and Appraisal Report [APP-300], section 13.2.4 a-d. Therefore, simply removing views of Stonehenge would not in itself sufficiently improve journey times to meet the Scheme objectives.	
Traffic approaching from the east going to the Stonehenge Visitor Centre may cause queues in the tunnel.	Surveys have been undertaken at the Stonehenge visitor centre to understand the existing and predicted demand and ensure it is appropriately reflected in the traffic forecasts used to inform the Scheme's design. Longbarrow junction has been designed with sufficient capacity to avoid any risk of traffic queuing in the tunnel. Further information can be found in the Transport Assessment [APP-297] section 6.7.	RR-0406, RR-1722
No assessment of the cumulative effects of the programme in terms of increased traffic and emissions.	It is assumed that, by " <i>programme</i> ", the representation is referring to the programme of works included within Road Investment Strategy (RIS) 1. The cumulative impacts arising from other schemes to enhance the A303 corridor committed to within RIS1 have been fully considered. In relation to cumulative traffic effect, further traffic details can be found in the Transport Assessment [APP-297] section 5.3. Regarding cumulative emissions effects, the traffic data utilised in the assessment of air quality effects assumes that the Road Investment Programme (RIP) schemes in the Road Investment Strategy (RIS1) to the west of Stonehenge: the A303 Sparkford to Ilchester improvement; and the A358 Taunton to Southfields scheme are constructed and operational, as set out in ES Chapter 5, Air Quality [APP-043], Section 5.4. As such, the full impacts of these schemes are fully understood in the context of emissions.	RR-1683
Traffic growth will mean that the road will still be congested.	The traffic forecasts produced for the Scheme indicate that the proposed dual two-lane carriageway will have sufficient capacity to cater for future growth. Transport Assessment [APP-297] section 6.4 shows traffic flow change forecast with the Scheme and indicates that the A303 will be operating well within its capacity.	RR-0993, RR-1743, RR-1683, RR-1859, RR-1671, RR-1732, RR-2314, RR-2233
Concerns regarding impacts on other pinch-point sections of the A303.	The Scheme is part of a programme of improvements designed to upgrade the entire A303 route to a high-quality dual carriageway between the M3 and the M5 at Taunton, which will alleviate congestion along the whole route, including pinch-point sections, as part of Highways England's Road Investment Strategy (RIS) (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf),	RR-1330, RR-2119
Concern the tunnel will be a bottleneck.	The standard of the dual carriageway would be retained through the tunnel, providing ample capacity to secure the continuous, safe, free flow of traffic, preventing a bottleneck.	RR-0591, RR-1520
Concern about corridor	As set out in its Road Investment Strategy	RR-1330, RR-1918,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
bottlenecks.	(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), the Government's aim is to upgrade all remaining single carriageway sections of the A303/A358 corridor into a high-quality dual carriageway route, improving connectivity to the South West. As such, bottlenecks would not be caused by the Scheme. There is a programme of schemes along the corridor that will be pursued in the coming years to deliver the strategy, addressing existing bottlenecks along the corridor.	RR-1963, RR-2061, RR-2208
Traffic should be dissuaded from heading north when they leave the visitors centre.	Signage would direct traffic to and from the Stonehenge Visitor Centre via the new Longbarrow junction. The Scheme would remove congestion from the A303 and provide a free-flowing dual carriageway connection for those wishing to travel beyond the immediate area. This would reduce the likelihood of people leaving the Stonehenge Visitor Centre and travelling via routes which avoid the A303.	RR-1722
The Scheme will result in disruption on local roads.	The existing A303 would remain in operation throughout construction and flows on local roads are not anticipated to change to any significant degree. Further information can be found in the Transport Assessment [APP-297], section 9.5. Temporary traffic management measures would be put in place at times and there would be close liaison with Wiltshire Council to agree how the measures can be best implemented to minimise any disruption. The Scheme's completion would see local roads relieved of rat running traffic and operating much more efficiently, separated from but with easy connections to the free-flowing A303. Section 6 of the Transport Assessment provides further details on the Scheme's impact on local network performance.	RR-1261, RR-1980
Concerns over the quantity of large vehicles using local roads in general.	The A303 forms part of the strategic road network, which is essential for the efficient movement of goods throughout the country and to support business activity at local, regional and national levels. Improving the reliability and resilience of the A303 will encourage HGVs to remain on the route, making use of a road which is designed to accommodate them, rather than using less suitable local roads.	RR-2112
Road users are currently slowing down to look/take photos of Stonehenge which slows down traffic / is a traffic safety risk.	Removing views of Stonehenge from the A303 will not in itself remove congestion, which arises because the volume of traffic seeking to use the A303 at various times is greater than the capacity of the road. The construction of the Scheme would mean that the stones at Stonehenge would no longer be visible from the road and this in itself would address any issues of traffic slowing to view Stonehenge.	RR-0609
Increased speed generated	The Scheme is part of a programme of improvements designed to upgrade the entire	RR-0627, RR-1800,

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
from bypassing the bottleneck moves the traffic congestion further along the A303 at the next bottleneck.	A303/A358 route to a high-quality dual carriageway between the M3 and the M5 at Taunton, as set out in the Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf). When complete, this will alleviate congestion along the whole route and will avoid bottlenecks.	RR-2032, RR-1963, RR-2133
Support for the improvements to traffic speed and reducing traffic jams.	The Scheme, if consented, would have a range of positive impacts on traffic, such as improved journey times and reliability along the A303. There would also be improved safety and reduced traffic levels on local roads in the vicinity. This is explained further within section 5.2 of the Case for the Scheme [APP-294].	RR-0013, RR-0030, RR-0809, RR-1626
Will not use tunnel and instead will still use rat runs.	The Scheme would accommodate free-flowing east-west traffic safely through the tunnel. It would provide shorter, more reliable journey times than side roads through local villages. As a consequence, it is expected that people would choose to use the A303 in preference to less suitable local roads. Further information can be found in the Transport Assessment [APP-297] in particular at sections 6.3.11 and 6.5.	RR-0031, RR-0584, RR-2200
Increased pressure on byways and bridleways during Solstice events.	Currently, during Solstice events, local traffic management plans are implemented to restrict stopping in the roads adjacent to the A303 and land owners make private arrangements for parking on their land. The Scheme would not materially change these access and event management requirements. Traffic management along the former A303 through the WHS would no longer be required as this would be converted to a restricted byway and access to motor vehicles would be prevented. During construction the contractor would be required to consult appropriately and ensure that the Solstice event traffic management requirements are accommodated. Requirement 9 (Traffic Management) of the draft DCO [APP-020] requires that no part of the authorised development is to commence until a traffic management plan applicable to the construction of that part has been submitted to and approved in writing by the Secretary of State, following consultation with the local highway authority. The authorised development must then be constructed in accordance with that approved plan. Further detail can be found in the Outline Environmental Management Plan [APP-187] (section 3.3 ref MW-TRA2).	RR-0036
Lessons must be learnt from the frequent closure of the A3 Hindhead Tunnel.	The experience from the Hindhead Tunnel has been reviewed and has informed the design and operational requirements of the A303 tunnel. In particular, in assessing the Scheme, Highways England has considered how the Hindhead Tunnel manages traffic through the tunnel when maintenance activities are being undertaken and during the management of incidents. Defining the key operational functions central to the safe and effective management of traffic across the	RR-2243

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	route has been a key aspect of the design for the A303 Stonehenge scheme.	
Not enough information has been provided on signage and lighting; both will need careful planning.	Images were designed to provide an indicative visual representation of the overall Scheme at the time of consultation and further detail is provided within the plans and drawings comprising volume 2 of the DCO application [APP-004 to APP-019]. The majority of the Scheme would not be lit. Road lighting is proposed at three locations only: in the tunnel; under Green Bridge No. 4 (day time only) and at Countess roundabout. This lighting is provided for in the Outline Environmental Management Plan (OEMP) [APP-187] (D-CH9 to D-CH12), and paragraph 4 of Schedule 2 of the DCO [APP-020] requires the scheme to be carried out in accordance with the OEMP. In terms of infrastructure visibility within the WHS, the Scheme has committed to no signage or other vertical installations (such as CCTV) above the top of the cutting and no lighting of signs at the western end of the Scheme in order to protect the WHS's OUV (OEMP [APP-187] (D-CH8)). Appropriate signage and infrastructure will also be provided outside the WHS to manage traffic through the corridor.	RR-1546, RR-2329
Fix existing road problems (potholes etc.) before building anything.	Highways England is responsible for ongoing maintenance of the strategic road network, in addition to its upgrade and improvement. The local road network is maintained by the local highway authority, being Wiltshire Council in this area.	RR-1223, RR-1545, RR-1942
Where and how will the local Emergency Services cope with inevitable accidents, fire, etc? As a community we would like to see extensive plans put into place.	Highways England has been working with the Emergency Services throughout the design of the Scheme. Representatives from the Emergency Services have played an important role at the Tunnel Design Safety and Consultation Group (TDSCG) meetings to help shape key aspects of the Scheme's design and operational requirements. The Emergency Services have been involved in many aspects of the design which include identifying appropriate emergency response plans that will need to be developed during the detailed design to address potential incidents within the tunnel and on the road. They have also supported the Scheme through their input to safety and design assessments that have informed the initial development of the Scheme. The engagement will continue through the detailed design, the construction and the operation stages of the Scheme.	RR-0066, RR-0046, RR-2243
The new road and tunnel should be open to all vehicles, to prevent restricted vehicles clogging up villages and village roads.	The only motorised vehicles that will be prohibited from using the tunnel are abnormally high-sided vehicles; and motorcycles below 50 cubic centimetres. The restriction on motorcycles with an engine capacity below 50 cubic centimetres is described in Part 2 of Schedule 10 to the draft DCO [APP-020] and shown on sheets 4, 5, 6, 7, 8 and 9 of the traffic regulation measures plans (clearways and prohibitions) [APP-014]. Standard design guidance for the UK strategic road network, DMRB Volume 6, TD 27/05, has been followed and this is to provide clearance of	RR-2237

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>5.03m for vehicles using the tunnel. The diversion route for high load vehicles would be the A360/B3086/The Packway/Solstice Park junction (see section 2.3.63 of the Environmental Statement [APP-040] and Figure 2.6 <i>High Load and Diversionary Route</i> [APP-060]). The number of vehicles that would regularly divert is low [APP-297], Section 6.15 and far outweighed by the forecast reduction in traffic using the Packway (forecast to reduce by over 4000 vehicles per day by 2041 [APP-297], Section 6.3.13).</p>	
<p>How are you addressing safety for NMUs when crossing green bridges?</p>	<p>Fences will be provided to prevent unsafe access. The design of any safety fencing installed within or in the vicinity of the WHS will need to be sensitive to its setting. The Outline Environmental Management Plan (OEMP) [APP-187] at reference D-CH14, compliance with which is secured by requirement 4 of Schedule 2 to the draft DCO [APP-020], requires Highways England to develop the detail of fencing within the WHS in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council. Fencing will be provided to bridges where appropriate to ensure the safety of non-motorised users (NMUs).</p>	<p>RR-1918</p>
<p>Motorbikes will be forced off the A303 and onto lengthy detours.</p>	<p>Motorbikes would be able to continue to use the A303, however, to align with the Design of Road Tunnels standard (BD78/99), motorcycles with 50cc engines or less would be prohibited from using the tunnel. Such vehicles travel at slow speed and represent a hazard to other road users on high speed sections of the network and increase the likelihood of incidents occurring due to high differences in speed between vehicles. These users would need to travel between Longbarrow and Countess junctions via the A360/B3086/The Packway/A345 (a diversion of approximately 3.3 miles) but would otherwise be able to use the A303 which would not therefore result in a lengthy detour. Users of motorbikes with engines above 50cc will be unaffected.</p>	<p>RR-0844</p>
<p>How will 'unwanted access' be managed across the WHS? For example, to prevent illegal and unauthorised fly-tipping, hare coursing, parking, camping and motorhomes parking up on the byways?</p>	<p>The management and enforcement of access across the WHS is a matter for Wiltshire Council (as the highways authority with responsibility for the public rights of way), as well as landowners, including the National Trust and English Heritage. Fences along public rights of way would be provided to prevent access onto private land, grazed grassland or the highway. Public access to bridleways would be controlled by equestrian gates which are too narrow for most vehicles to use. Public access to restricted byways would be controlled by Kent carriage gaps which are designed to prevent entry by vehicles.</p>	<p>RR-0036, RR-0905, RR-2288, RR-2303, RR-2306, RR-2134, RR-1588, RR-2237, RR-2201, RR-2108, RR-2354, RR-1606, RR-2345, RR-2088, RR-2220</p>

18 Scheme Sections – Eastern, Central and Western

18.1 Overview

- 18.1.1 A total of 8 interested parties raised matters regarding the design within the eastern section, 5 regarding the central section and 17 regarding the western section of the scheme in their relevant representations.
- 18.1.2 Table 18-1: Scheme Sections – Eastern, Central and Western provides a summary of the key issues raised in relation to design within the eastern, central and western sections, alongside a response from Highways England.

Table 18-1: Scheme Sections – Eastern, Central and Western

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
Keep the Allington Track and Amesbury Road junctions with the A303 open.	The Allington Track and Amesbury Road closures are proposed because they currently give rise to potentially hazardous conflicts between slow and fast-moving traffic on the A303. There were 2 slight and 1 severe recorded accidents at these junctions between 2007 and 2016.	RR-1669
Completely remove road/carriageway/tarmac from the stopped-up sections of the Allington Track, AMES1, AMES2 and BULF12.	<p>Generally, the road surface will be removed completely from the stopped-up sections of Allington Track, AMES1, AMES2 and BULF12, leaving an appropriate surface where access is required for landowners and other authorised users.</p> <p>Part of the stopped-up section of AMES1 has been identified as replacement land to be exchanged for open space that is required for the Scheme. The replacement land is identified on sheet 7 of the Special Category Land Plans [APP-006] as plots 10-17 and 11-33. Article 34 of the draft DCO [APP-020] requires Highways England to prepare a scheme for the provision of the replacement land as open space for certification by the Secretary of State, in consultation with the local planning authority, together with a timetable for implementation, after which the special category land may vest in Highways England. As such plots 10-17 and 11-33 will be laid out as open space.</p> <p>Another part of Byway AMES1 is required as a length of new footpath. This is shown on sheet 11 of the Rights of Way and Access Plans [APP-009] where it is labelled as reference P.</p>	RR-1586, RR-1542
Provide access for local	Access would still be available for local landowners on the stopped-up sections of Allington	RR-1594

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
landowners on stopped-up sections of the Allington Track and AMES1.	Track and AMES1. The replacement private means of access are shown on sheet 11 of the Rights of Way and Access Plans [APP-009] at references 38 and 39. Article 10 of the draft DCO [APP-020] requires Highways England to make the replacement means of access available, or provide a temporary means of access pending completion of the replacement means of access, before stopping up the existing access.	
Neutral view of this section of the Scheme.	Your comment is noted.	RR-1594
The roads at Solstice Park need parking restrictions and alternative HGV parking.	Parking restrictions on the local road network are a matter for the local highway authority, Wiltshire Council.	RR-1594
Retain byways AMES2 and BULF12.	AMES2 and BULF12 are being closed to improve safety along the A303. This is needed because the current arrangement places slow and fast-moving vehicles in potentially dangerous conflict with each other. Alternative connectivity with the A303 in this vicinity will remain available at Amesbury Road (north) and the A3028. There were 2 slight and 1 severe recorded accidents at this junction between 2007 and 2016.	RR-0859
The Allington Track link should be of adequate width.	The Scheme makes appropriate provision for large load vehicles to pass general traffic on the line of the new Allington Track connection, which will be approximately the same width as the existing Allington Track at circa 5.5 metres wide. Inter-visible passing places will be provided at approximately 300m intervals to provide a total width of approximately 8.5 metres to enable abnormal loads to pass other vehicles safely. The final location and spacing of passing places and the precise width of the Allington track will be determined at the detailed design stage. The new Allington Track connection is shown on sheet 11 of the Rights of Way and Access Plans [APP-009], as reference M, and together with references N and O (also shown on Sheet 11 of the Rights of Way and Access Plans [APP-009]) is provided as a replacement for the stopping up of a length of bridleway AMES29, from its junction with Equinox Drive for a distance of 105 metres in a generally south-easterly direction. Reference M (together with references P, N and O) also provide a substitute for the stopping up of part of byway AMES1, from its junction with the A303 for a distance of approximately 770 metres in a generally southerly direction, also shown on sheet 11 of the Rights of Way and Access Plans and described in Part 1 of Schedule 3 to the draft DCO [APP-020].	RR-1581

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>The standard of the Allington Track diversion should be no greater or different from the existing standard of the Allington Track which is approximately 5.0-5.2m wide with narrow verges and (where in cutting) has steep side slopes – accepting that passing places are to be provided as shown on the General Arrangement Drawings. The standard of the AMES1 byway should be no greater than is necessary.</p>	<p>The new Allington Track link would be similar in width to the existing Allington Track. Passing places would be provided to ensure large loads and farm vehicles can pass one another safely. The AMES1 byway diversion would be constructed to the reasonable satisfaction of the highway authority in accordance with article 9 of the draft DCO [APP-020].</p>	<p>RR-1537</p>
<p>A requirement will be sought to secure appropriate provision for large load vehicles to pass general traffic on the line of the alternative Allington Track connection to A303.</p>	<p>The Scheme makes appropriate provision for large load vehicles to pass general traffic on the line of the new Allington Track connection, which will be approximately the same width as the existing Allington Track. Inter-visible passing places will be provided at approximately 300m intervals to ensure large loads and farm vehicles can pass safely. The new Allington Track connection is shown on sheet 11 of the Rights of Way and Access Plans [APP-009], as reference M, and together with references N and O (also shown on Sheet 11 of the Rights of Way and Access Plans [APP-009]) is provided as a replacement to the stopping up of a length of bridleway AMES29, from its junction with Equinox Drive for a distance of 105 metres in a generally south-easterly direction. Reference M (together with references P, N and O) are also to be substituted for the stopping up of part of byway AMES1, from its junction with the A303 for a distance of approximately 770 metres in a generally southerly direction, also shown on sheet 11 of the Rights of Way and Access Plans and described in Part 1 of Schedule 3 to the draft DCO [APP-020].</p> <p>Article 10(2) of the DCO prohibits the stopping of up that part of AMES29 until the substitute streets (references M, N, O and P) have been completed to the reasonable satisfaction of the street authority and are open to use. In this instance the street authority would be Wiltshire</p>	<p>RR-1581</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	Council. Consequently, the imposition of a requirement in these circumstances is unnecessary and would be duplicative of the controls already in place in the draft DCO.	
The closure of AMES2 means there is no connection north and south of the A303.	Instead of using AMES2 and BULF12 to reach Bulford, access would be from Amesbury Road (north of A303). The Amesbury Road and Allington Track junction/access closures on the A303 are proposed for reasons of safety, and to improve the current arrangement, which has the potential to place slow and fast-moving vehicles in dangerous conflict with each other. An alternative reasonably convenient safe crossing point on the A303 trunk road would be available a short distance to the east, via the Solstice Park junction.	RR-0859, RR-1669
Which substation in the Ratfyn area will be used for the energy supply on the Scheme and what works will be required at the site?	Since the DCO application was submitted, Scottish and Southern Energy plc (SSE) has identified that only the southern Ratfyn substation would be required for the A303 works. Therefore, it is possible that works will not be required in plots: 09-30, 09-31, 09-36, 09-37, 09-38 and 09-40 (as shown on Sheet 9 of the Land Plans [APP-005]). SSE has also indicated that all necessary works at the southern Ratfyn substation may potentially be carried out within the current substation footprint. This may reduce the need for permanent land acquisition at plots 09-43 and 10-01. However, until the scope of the required works is confirmed it is necessary and appropriate for Highways England to continue to seek compulsory powers to safeguard the delivery of the Scheme.	RR-1594, RR-1792
What is the proposed cable route from the chosen Ratfyn substation? What legal right will be used to acquire this? Who will be the acquiring authority (Scottish and Southern Energy or Highways England)?	Scottish and Southern Energy plc (SSE) have indicated that the proposed cable route would run southwards down the Ratfyn Track until bordering the A303 where it would then connect through into Highways England's land. It is likely the necessary rights will be exercised through the use of a wayleave or an easement however this is yet to be confirmed. Until the final cable route is confirmed it is necessary and appropriate for Highways England to continue to seek compulsory powers to safeguard the delivery of the Scheme.	RR-1792
An alternative route for the underground electricity cables along the Ratfyn track has been suggested by the tenant farmer and should be adopted to avoid disruption to regular vehicle movements and the	The proposed alternative electricity cable route is the former access to Ratfyn Farm which was severed when the Amesbury Bypass was constructed. Land comprising the route has been used subsequently to store damaged and redundant equipment and farm building materials, including what appear to be corrugated asbestos cement sheets. The significant challenges of removing these materials could make this proposed route unviable. An alternative may be available along the field margin east of the narrow section of Ratfyn track, which is in the same ownership.	RR-1594, RR-1792

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
existing utilities.	Discussions are ongoing with the landowner and tenant.	
A new access to Earls Farm Down, southern side, on the newly aligned Allington Track will be needed. This is not currently included in the DCO design.	Highways England is discussing this issue with the affected landowner with the aim of reaching agreement on the approach to be taken.	RR-1792
It is not necessary to divert Byway AMES1 as currently proposed. An equally satisfactory, and significantly cheaper solution could be to continue AMES1 as far as the then diverted Allington track, which it could join by way of a "T" junction.	The suggested location of the diverted Allington Track / AMES1 T-Junction on the line of the existing AMES1 has been considered by Highways England. The suggested T-Junction would require vehicles travelling north along AMES1 to make a very sharp left hand turn to join the new link to Equinox Drive (reference M on sheet 11 of the Rights of Way and Access Plans [APP-009]). Similarly, vehicles travelling on the new link in an eastbound direction would need to make a very sharp right hand turn to join AMES 1 in a southbound direction. The sharp turn required by the suggested junction would require an excessive carriageway width to accommodate the swept path of those turning movements. Consequently, this option was not progressed further.	RR-1537
The Scheme does not reunite the southern and northern parts of the WHS as it will still be divided by an expressway.	The A303 would be realigned and the existing A303 trunk road would be downgraded to a restricted byway (available only to non-motorised users). The removal of the existing A303 surface road from a large part of the WHS landscape, with 2 miles of road passing through a tunnel and under Green Bridge No.4, would greatly increase connectivity between the currently severed halves of the WHS.	RR-0021, RR-0481, RR-0392, RR-0839, RR-0964
Do the Rollestone junction improvements before the main works.	Highways England has made provision in the Scheme to enable the realignment of the Rollestone Cross junction to be carried out as preliminary works ahead of the main works, subject to the grant of the development consent order for the Scheme. The Rollestone Cross junction re-alignment is shown on sheet 13 of the works plans [APP-008] and described in Schedule 1 to the draft DCO [APP-020] under Work No.5. Work No.5 falls within the definition of "preliminary works" in paragraph 1 of schedule 2 to the draft DCO. Requirement 4 in Schedule 2 to the draft DCO [APP-020] makes express provision for compliance with a preliminary works Outline Environmental Management Plan, which is contained in the (main) Outline Environmental Management Plan [APP-187].	RR-1615

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	Through this mechanism Highways England would be able to deliver the Rollestone Cross junction re-alignment before having completed the construction environmental management plans for the main works, if development consent for the Scheme is granted.	
The balancing ponds shown in the western section of the Scheme need to be rationalised in terms of their numbers and locations. Their large size should also be reviewed to avoid causing disruption to farming.	<p>The numbers of drainage infiltration areas in the western section have been rationalised in terms of reducing the number from six to five and locating them closer to the new road. The preliminary basin design has been integrated within the landscaping proposals around the River Till, blending sympathetically into the landscape.</p> <p>Due to the reduced number of drainage infiltration areas, one infiltration area needs to be slightly larger to meet the storage capacity requirement. The basins also provide permanently wet areas, contributing to biodiversity enhancements. This design refinement reduces the agricultural land take and makes the Scheme's drainage features less disruptive to farming.</p> <p>The infiltration basins are described in ES Appendix 11.3 - Road Drainage Strategy [APP-281]. The final sizing of the basins would be subject to the detailed design process and it is anticipated that these areas would be fenced to ensure segregation from livestock. The final design would be subject to the approval of the Secretary of State, following consultation with Wiltshire Council, pursuant to requirement 10 of Schedule 2 to the DCO.</p>	RR-2108, RR-2354, RR-1606, RR-2345
The B3083 should go over the A303, not under it.	To minimise visual intrusion to nearby Winterbourne Stoke, and to be able to align with the surrounding landscape, the B3083 crosses under the A303 which is on an embankment on its approach to the River Till viaduct. This allows better integration of new earthworks into the existing landscape by grading out of the A303 embankments in this area and rounding off the top of cuttings to the completed earthworks. Further information on the design principles can be found in the Environmental Statement Chapter 7 – Landscape and Visual Effects [APP-045] section 7.8, paragraph 7.8.1 and in the Design and Access Statement [APP-295] at section 6.3, paragraphs 6.3.10 to 6.3.12. The proposed and existing levels for the B3083 underbridge are shown on sheet 3 of the Engineering Section Drawings (Plans and Profiles) [APP-010].	RR-1008, RR-1047
Green Bridge No. 1 should not be accessible to NMUs. It should provide farm access only.	Green Bridge No. 1 serves more than farm access; it also accommodates a new restricted byway which continues along the north side of the new road westwards to connect with the existing byway SLAN3. This allows for the safe crossing of the A303 by walkers, cyclists, horse riders and horse-drawn carriages.	RR-0036
The bypass is unnecessary and may damage the	In order to resolve known problems of congestion, the A303 is to become a dual carriageway. It would not be practical or desirable to dual the road through Winterbourne Stoke, so	RR-0353

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
<p>environment.</p>	<p>necessitating a bypass. The Scheme has been identified as the best solution from an exhaustive appraisal of options. Whilst the Scheme will have some adverse environmental impacts, it will also deliver significant environmental benefits, including for Winterbourne Stoke, the WHS and for local communities. Further information on the Scheme's objectives can be found in the Case for the Scheme [APP-294]. Regarding the potential for damage to the environment, the viaduct design has been chosen to carry the new road across the Till valley whilst retaining the open character of the valley floor, and to minimise its visual impact in the landscape in which it is proposed to be located. As set out in ES Chapter 7, Landscape and Visual [APP-045], section 7.8, the Scheme includes sympathetic regrading of the earthworks, new planting around the viaduct abutments, and new native hedgerow, to aid integration of the viaduct into the landscape and reduce visual intrusion. These measures are secured as part of the landscaping Scheme to be implemented pursuant to paragraph 8 of Schedule 2 to the draft Development Consent Order [APP-020]. Further, as set out in ES Chapter 8, Biodiversity [APP-046], the viaduct has been located and designed to minimise the impacts on the River Till SSSI, in particular the height of the viaduct has taken into account minimisation of shading on the below River Till SSSI and the adjacent grassland habitat, part of the River Avon SAC. The Outline Environmental Management Plan [APP-187], reference D-BIO1, requires the River Till viaduct to comprise a twin deck viaduct structure with a minimum 7m open gap between the bridge decks and requires the locations of the viaduct piers and foundations to be outside of the extents of the SAC and SSSI. Compliance with the Outline Environmental Management Plan is secured by requirement 4 of Schedule 2 to the draft DCO [APP-020].</p> <p>With regards for archaeology, the preferred route was carefully chosen to minimise effects on archaeology, and a comprehensive programme of archaeological evaluation surveys has informed the Scheme being designed in a way that has limited any direct physical impacts on archaeology. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction. The principles of archaeological mitigation are outlined in Appendix 6.11 of the ES, Outline Archaeological Mitigation Strategy (OAMS) [APP-220], which has been informed by a comprehensive programme of archaeological evaluation. A Detailed Archaeology Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group, the implementation of which is secured by paragraph 5 of schedule 2 to the draft Development Consent Order (DCO) [APP-020].</p>	

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	<p>During construction, potential impacts will be controlled and mitigated through the implementation of the Outline Environmental Management Plan (OEMP) [APP-187], as set out in Table 3.2a: Register of Environmental Actions and Commitments (REAC) tables for the preliminary works, and Table 3.2b: REAC tables for the main works. The OEMP is secured through paragraph 4 of schedule 2 to the draft DCO [APP-020].</p>	
<p>Landscaping is needed along the bypass to screen it from the village.</p>	<p>Screening is proposed along the south side of the bypass for the benefit of Winterbourne Stoke; whilst this is shown indicatively on sheets 3 and 4 of the General Arrangement Drawings [APP-012], the precise details of the screening will be determined in due course, during the detailed design of the Scheme. Requirement 8 in Schedule 2 to the draft DCO [APP-020] requires, before the commencement of any part of the Scheme, the Secretary of State's approval, following consultation with the local planning authority, of a landscaping scheme for that part of the Scheme. The landscaping scheme must be based on the mitigation measures included in the Environmental Statement. The Outline Environmental Management Plan (OEMP) [APP-187], at reference MW-LAN1, requires the main works contractor to prepare a scheme-wide Landscape and Ecology Management Plan, developed in accordance with good industry practice. Compliance with the OEMP is secured through requirement 4 in Schedule 2 to the draft DCO [APP-020].</p>	<p>RR-0033, RR-0617</p>
<p>The bypass should be a single carriageway.</p>	<p>As set out within its Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), the Government's aim is to upgrade all remaining single carriageway sections of the A303/A358 corridor into a high-quality dual carriageway route, improving connectivity to the South West. Traffic forecasts indicate that a two-lane dual carriageway is needed to accommodate the predicted flows along the A303 and that a single lane road would not provide sufficient capacity. Further information can be found in the Transport Assessment, Section 6.4 [APP-297].</p>	<p>RR-0321</p>
<p>Build the Winterbourne Stoke bypass and not the rest of the scheme.</p>	<p>As set out within its Road Investment Strategy (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf), the Government's aim is to upgrade all remaining single carriageway sections of the A303/A30/A358 corridor into a high-quality dual carriageway route, improving connectivity to the South West. Solely building the Winterbourne Stoke bypass would not achieve that aim. Countess roundabout and the stretch of A303 past</p>	<p>RR-2078</p>

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
	Stonehenge would remain congested and the WHS would still suffer the adverse effects of the A303. Separating the scheme in this way would also be inefficient and more costly. Further information can be found in the Transport Assessment [APP-297].	
Avoid negative impacts on residents and the surrounding villages.	Consideration of the potential for impacts on residents and surrounding communities is presented in Environmental Statement (ES) Chapter 13, People and Communities [APP-051], which includes consideration of the potential for impacts on non-motorised users, motorised users, amenity of residents and workers, development land, and human health, as set out in ES section 13.7, Potential Impacts. As summarised in ES Chapter 3, Assessment of Alternatives [APP-041], the preferred route was chosen, and the Scheme subsequently developed to limit or avoid adverse impacts on residents and local communities. Details of mitigation proposals are set out in the Environmental Statement topic chapters, in particular those relating to air quality impacts, ES Chapter 5 [APP-043] at section 5.8, landscape and visual impacts, ES Chapter 7 [APP-045], section 11.8, and noise and vibration impacts, ES Chapter 9 [APP-047], section 9.8. During construction, implementation of measures contained within the Outline Environmental Management Plan (OEMP) [APP-187] would control and limit the potential for impacts on local residents and communities. The OEMP is secured through paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020]. As set out in ES Chapter 13, section 13.9, and summarised in Table 13.26, significant adverse effects on people and communities would be limited to the loss and disturbance to agricultural land and driver views where the sight of Stonehenge is lost from view.	RR-0037, RR-0297, RR-0440, RR-1890
Green Bridge No. 1 should be moved west to link with the BSJA3 junction.	The green bridges on the Scheme perform a number of functions, including: providing agricultural access, linking and maintaining public rights of way; and providing ecological connectivity. The locations of the green bridges strike a balance that meets the needs of these functions. Green Bridge No. 1 has to be where it is positioned because it would provide ecological connectivity with Parsonage Down SSSI for species of chalk grassland, provide potential connectivity for bats, serve agricultural access in this location, as well as accommodate a new public right of way. Details can be found in section 8.8 in ES Chapter 8, Biodiversity [APP-046].	RR-0036
Support for the green bridge proposals.	Thank you for your comment.	RR-1429
There is no detail given about the different designs that are	The detailed design of the green bridges would be developed in due course, if development	RR-0036

Summary of Comment Received	Highways England's Response	Relevant Representation Reference Number
available for green bridges.	<p>consent for the Scheme is granted.</p> <p>The Scheme's green bridge proposals are shown indicatively within the plans accompanying the DCO application (Sheets 1, 4, 5 and 6 of the Structures Drawings [APP-017]). Examples of completed green bridges can be found on the Weymouth Relief Road, the A21 Lambeth Bypass and the A556 link road between the M56 and the M6. An article providing pictures of the A556 bridge in construction and at completion can be found at the following link: https://www.gov.uk/government/news/a556-green-bridge-is-winter-wonderland. Examples of different designs for green bridges can be seen in a publication by the Landscape Institute (www.landscapeinstitute.org) titled Green Bridges Technical Guidance Note 09/2015.</p>	
There will be a clash between public access and biodiversity on the green bridges. How do the green bridges provide a biodiversity benefit?	<p>The ecological impact assessment, reported in ES Chapter 8, Biodiversity [APP-046], has concluded that the provision of greater ecological connectivity will result in a beneficial effect for biodiversity. This is in accordance with the recent project by Natural England 'Porton to the Plains' which emphasises the importance of connectivity between existing sites of value for nature conservation and especially connectivity of areas of chalk grassland. The broad green bridges will enable a wide range of species to cross the Scheme by day and at night, including butterflies and other invertebrates of chalk grassland, birds and mammals, as well as allowing spread of plants by seed. Green Bridges Nos. 1 to 3 are envisaged to have bunds on both sides, which will provide shelter on the bridges to aid crossing by butterflies and bats, as well as providing some separation of the habitats from the public paths. The precise form of the landscaping on the Green Bridges will be confirmed as part of the Scheme's detailed design, if development consent is granted. Requirement 8 of the draft DCO [APP-020] requires Highways England to obtain the Secretary of State's approval of a landscaping scheme, following consultation with the local planning authority, for each part of the Scheme before it is commenced. Green Bridge No. 4 will be approximately 150 m wide, providing a broad zone of chalk grassland for wildlife in addition to the public right of way. The width of Green Bridge No.4 is secured via the Outline Environmental Management Plan [APP-187] under reference D-CH4, compliance with which is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020].</p>	RR-0036

19 Wiltshire Council (RR-2365)

19.1 Key issues

Table 19-1: Wiltshire Council

Matter Raised	Highways England's Response
Highways and Transport Considerations	
<p>There is a requirement for clarification in relation to the provision and operation of traffic signals controls at both the Longbarrow and Countess Roundabouts, especially in relation to the integration of the signals with the tunnel management systems in the event of the closure of access via the eastbound merge slip-road at Longbarrow Northern Roundabout and the westbound merge slip-road at Countess Roundabout.</p>	<p>Based on the preliminary design, the signal control to stop traffic entering the tunnel will be through Advanced Motorway Indicators (AMI's), which will be located near the start of the Longbarrow northern dumb-bell roundabout eastbound merge slip road and Countess roundabout westbound merge slip road. AMI's will also be located above lane indicators at the tunnel entrances. This equipment will be maintained by Highways England.</p> <p>This matter is currently under discussion between Highways England and Wiltshire Council and will be captured in an agreement between the two parties.</p>
<p>There is a need to clarify which of the highway authorities (Highways England or Wiltshire Council) will be the vesting authority, responsible for the on-going maintenance of the carriageways and traffic signal controls at each of the junctions.</p>	<p>Article 9 of the draft DCO [APP-020] sets out which highway authority will be responsible for the maintenance of the new, altered or diverted streets (including highways) and other structures comprised in the Scheme. The default position under article 9 is that Highways England will be liable to maintain any trunk road comprised in the Scheme. The local highway authority will be liable to maintain any other highway, (i.e. other than a trunk road), including any structure or culvert, except for any bridge carrying a highway over a trunk road (see article 9(6)), and any highway that is de-trunked (see article 9(6)). Any highway that will become maintainable by the local highway authority must be completed to the reasonable satisfaction of the local highway authority which, in relation to the Scheme, will be Wiltshire Council. The purpose and effect of article 9 is discussed in further detail in the Explanatory Memorandum to the DCO [APP-021] at paragraphs 6.21 and 6.22.</p> <p>Article 9 (see article 9(1), 9(2), 9(3), 9(4), 9(5)) recognises that Highways England and the local highway authority may agree in writing to depart</p>

	from the default arrangements set out in those provisions. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council.
The existing Countess Roundabout is vested in Highways England. The TR010025 2.12 De-trunking Plans do not show Countess Roundabout as proposed to be de-trunked. Depending on the outcome of the clarification sought in a) above, there might be a need to amend the de-trunking plans.	Highways England confirms that the De-trunking Plans [APP-015] do not show the existing Countess Roundabout as being de-trunked and as such the responsibility to maintain the circulatory carriageway would remain with Highways England. Discussions are underway between Highways England and Wiltshire Council on highway maintenance matters which will be recorded in the Statement of Common Ground being prepared between the two parties, which will be submitted to the Examination in due course.
The Draft DCO includes within Schedule 9 Part 2 information in relation to the Northern and Southern Roundabouts forming the 'dumbbell' junction. Whilst the Classifications Plan clearly shows the roundabouts as being classified as the A360, Wiltshire Council will need to be clear as to the future assets for which it will be responsible. Whilst the working assumption has been that Wiltshire Council would be the default vesting authority for off-line junctions, this needs to be clarified. It would be logical that the vesting of the Longbarrow roundabouts is treated in the same way as the Countess Roundabout.	Schedule 9 to the draft DCO [APP-020] and the Classification of Roads Plan [APP-016] must be read alongside article 47 of the draft DCO. The roads described in Part 2 of Schedule 9, the slip roads between the A303 and the new Longbarrow Junction, will become a trunk road by virtue of article 47(1)(a). The roads described in Part 3 of Schedule 9, comprising the links between the existing A360 and the new Longbarrow Junction, the circulatory carriageways of the northern and southern roundabouts, and the link between the two carriageways carried by Green Bridge No.3 over the existing A303, will be classified as the A360 by virtue of article 47(1)(b) of the draft DCO. This is shown in Inset 2 on the Classification of Roads Plan. As noted above, roads that are not trunk roads must be completed to the reasonable satisfaction of the local highway authority which would then become responsible for their maintenance, by virtue of article 9(1). The responsibility for maintaining the highway surface of the A360 carried over the A303 trunk road by Green Bridge No.3 would fall to the local highway authority, although the structure of Green Bridge No.3 would be maintained by Highways England, by virtue of Article 9(6).
The Council will require clarification, following detailed design, about the precise boundaries to the new highway for which it will become the vesting authority. It will also require details for the associated support infrastructure including drainage arrangements (including any easements or maintenance access, lighting and power supply other cabling).	In all cases where Wiltshire Council would become the highway authority for a new highway comprised in the Scheme, Highways England confirms that details of the precise boundaries of the new highways, together with details of associated supporting infrastructure, to be maintained by Wiltshire Council, will be provided once the corresponding powers under the DCO have been exercised.
The TR010025 2.13 Classification of Roads Plan does not show any information about the Countess Roundabout. It is currently classified as the A303. As a grade separated trunk road junction, the roundabout should	The Classification of Roads Plan [APP-016] shows the A345 in grey (see in particular Inset 4). As is explained in Note 3 on the Classification of Roads Plan, the roads shown in grey are not referenced in Schedule 9

<p>be classified as the A345, consistent with the classification to the principal roads to the north and south. Consideration should be given to this issue in the context of those raised above.</p>	<p>(Classification of Roads etc) to the DCO because their existing classification is not affected by the DCO; as such they are shown on the Classification of Roads Plan for identification purposes only.</p>
<p>The TR010025 2.10 Traffic Regulation Measures Plans (Speed Limits) show a proposed speed limit of 30 mph for the realigned section of the Allington Track (also in the Draft DCO Schedule 10 Part 1); Wiltshire Council is concerned as to the compatibility of the speed limit with the Department for Transport Circular 01/2013, and with the speed limit on the existing Allington Track; it appears to be set unnecessarily low. The Council believes the police should be consulted on the matter, but it is unclear whether this has been done. The DCO proposed speed limit appears to be driven by the isolated bend between new and existing parts of the Allington Track.</p>	<p>The proposed horizontal alignment for the new Allington Track link (shown on Sheet 11 of the Traffic Regulation Measures Plans (Speed Limits) [APP-013]) includes two bends, of 90 metres (to the west) and 35 metres (to the east). This design has been agreed with Wiltshire Council. The speed limit has therefore been reduced to reflect the design.</p> <p>As reported in the Consultation Report [APP-026], paragraphs 3.4.5 to 3.4.7, Highways England complied with its duties to carry out pre-application statutory consultation under the Planning Act 2008. The Police and Crime Commissioner for Wiltshire and Swindon was consulted under section 42(1)(a), see Appendix E9 [APP-032] to the Consultation Report.</p>
<p>There appears to be some inconsistencies within the Draft DCO at Schedule 9 Part 1 in relation to the description of the length of the new and improved A303 trunk road. The length is described as 11.7km and 11.6km, and the cumulative length of the descriptive parts appears to be 11.51km.</p>	<p>Article 2(4) of the draft DCO [APP-020] confirms that all distances, directions, areas and lengths referred to in the DCO are approximate. This is necessary to avoid having to insert the word "approximately" before every distance stated in the Order. This is in line with DCO drafting conventions and the Secretary of State's own established practice where references to "approximately" are routinely removed from Orders that contain an article equivalent to article 2(4) (for a recent example see paragraph 60 of the Secretary of State's decision letter on his approval of the A19/A184 Testo's Junction Alteration Development Consent Order 2018). As a consequence of this rounding approximation the addition of the constituent parts may not reflect the approximate of the total. Nonetheless, Wiltshire Council's observations have been noted and Highways England will consider whether it is appropriate to update the relevant measurements when invited by the examining authority to submit to the examination an updated draft DCO, in due course.</p>
<p>Schedule 9 Part 7 of the Draft DCO sets out proposed classification classes for the existing A303 around Winterbourne Stoke. The Council questions the Class 3 proposed classification for the 595m length of road west of the western B3083 junction to the south side of the existing A303. This road will be a little used cul-de- sac and more appropriately unclassified.</p>	<p>Highways England considers the 'C' classification for the 595 metre length of the existing A303 (to be de-trunked), as shown dashed orange on the Classification of Roads Plan [APP-016] (see Inset 1) to be appropriate, but acknowledges that Wiltshire Council will become the highway authority responsible for the maintenance of this stretch of road once it has been de-trunked. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be</p>

	maintained by Wiltshire Council. The outcome of those discussions will be recorded in the Statement of Common Ground being prepared between the two parties, which will be submitted to the Examination in due course.
The works proposals do not provide for any works at the layby to the western end of the above section of existing A303. The Council is concerned as to the potential abuse of this area of highway, especially bearing in mind proximity to Stonehenge. Potential alternative uses will need to be considered. It is also questioned as to why this layby is excluded from the de-trunking Plans.	Highways England confirms that the Scheme does not propose the closure of the layby, shown on sheet 3 of the Rights of Way and Access Plans [APP-009]. Discussions are underway between Highways England and Wiltshire Council. The outcome of those discussions will be recorded in the Statement of Common Ground being prepared between the two parties, which will be submitted to the Examination in due course.
There is some concern as to the adequacy of the coverage of the 6.3 Environmental Statement Appendices Appendix 2.2 Outline Environmental Management Plan in relation to some areas of Record of Environmental Actions and Commitments (REAC) tables at 3.2a and 3.2b. For example, the Core Working hours are set at 07:30 – 18:00 Monday to Friday and 07:30 – 13:00 Saturday, which appear to be inconsistent with TR010025 7.4 Transport Assessment assumptions in relation to normal working hours for establishing hourly construction traffic impacts, which states at 9.3.3, it is assumed that deliveries will be scheduled during a 12 hour period (7am to 7pm) 6 days a week. Clarification will be sought as to proposed restrictions to be governed by the DCO.	Items PW-G4 and MW-G2 of the OEMP [APP-187] set out the core working hours respectively for the preliminary works and mains work and explain where additional working hours would be appropriate. These hours were used for the purpose of the relevant non-traffic related assessments in the ES, notably noise and vibration [APP-047]. The Transport assessment, paragraph 9.3.3 [APP-297], explains the simplified interpretation of construction hours used in the assessment and took a precautionary approach to the assessment of construction traffic by including an additional 30% allowance of construction traffic to provide a robust assessment of the potential impacts.
The REAC Tables also detail items to be covered by e.g. the Traffic Management Plan (TMP); the Council will make representations about issues of concern in relation to coverage and items it believes should be included in more detail. For example, the construction phases of the development are forecast to be when most impact will be felt on the local road network. The TMP will be a key document in this regard and it will be necessary to ensure that local routes are protected as far as is practicable by the A303 diverted traffic (both environmentally and structurally). The REAC Tables should include, for example, a requirement for pre and post works condition surveys and for the regional diversion measures to be provided to advise at a distance of Stonehenge area delays.	The production of a Traffic Management Plan (TMP) is secured through paragraph 9 of Schedule 2 of the draft Development Consent Order [APP-020], the wording of which requires its content to be consulted upon with Wiltshire Council. Item MW-TRA2 of the OEMP (compliance with which is secured by paragraph 4 of Schedule 2 of the draft DCO), sets out the issues that the TMP must cover, which includes traffic management measures. The detail of these matters is under discussion with Wiltshire Council.
There will be an incentive for haulage sub-contractors seeking to maximise loads per day shifted from east to west of the site to use alternative routes, such as The Packway, because of the potential delays on the A303 (especially westbound) route; enforceable measures will be sought to take action against offenders in an appropriate manner.	This issue is currently under discussion between Highways England and Wiltshire Council and will be agreed between the relevant parties in due course for inclusion in the Traffic Management Plan(s) (TMP), which is secured through paragraph 9 of Schedule 2 to the draft DCO [APP-020].

<p>Highways England have provided no detail on the potential impact of the Solstice events during the construction and operation of the Scheme.</p>	<p>As described in detail in Chapter 10 of this report [ENV-479] the Scheme, overall, would have a large beneficial effect on the Attribute of the OUV of the WHS to which solstice events contribute. The assessment of the potential for impacts on the solstice is set out in the Heritage Impact Assessment (HIA), ES Appendix 6.1 [APP-195]. The Outline Environmental Management Plan (OEMP) [APP-187], which is secured through paragraph 4 of Schedule 2 of the draft Development Consent Order [APP-020], at item MW-G16, sets out that surface works within the western section of the WHS would be suspended during summer and winter solstice (hours to be determined in consultation with the relevant bodies). Further, the OEMP sets out a requirement for the contractor to consult with event organisers, which includes Solstice events (MW-TRA2). Highways England continues to work with Wiltshire Council to limit any potential adverse impacts or illegal activity during solstice events during the operation of the Scheme.</p>
<p>Wiltshire Council will seek to agree commuted payments to support those additional assets for which it could become responsible and ensure absolute clarity of the extent / boundaries of such assets.</p>	<p>This matter is currently under discussion between Highways England and Wiltshire Council and will be subject to agreement.</p>
<p>The Council reserves its position in relation to any changes which might come forward for consideration at the Examination and appreciates that there will be a considerable degree of additional output on which it will need to comment further as detailed design eventually moves forward.</p>	<p>Noted.</p>
<p>Archaeology and World Heritage Considerations</p>	
<p>It is understood that the DCO is presented as an indicative design Scheme (7.2 Design and Access Statement 1.2.1) and that further design details will follow post consent. However, the lack of design details at this stage makes it difficult to fully assess the impact of the Scheme on cultural heritage, landscape setting and the need for mitigation. For example, the extent and location of utility trenches or the engineering details for the Till Valley, green bridges and tunnel portal or the exact requirements for road signage and fencing are unknown.</p>	<p>Highways England considers there is sufficient information provided in the application to allow the Scheme's likely significant effects to be understood and to inform the need for mitigation. The design has been fixed to an appropriate level for the DCO application. The design is sufficiently developed to have undertaken a comprehensive Environmental Impact Assessment (EIA), as reported in the Environmental Statement (ES) [APP-039 – APP-054], and, in the context of the World Heritage Site, a Heritage Impact Assessment (HIA) [APP-195]. The parameters of the permission sought are constrained to the horizontal limits established by the Works Plans [APP-008], the vertical limits of the Engineering Section Drawings (Plan and Profiles) [APP-010], the Engineering Sections Drawings (Cross Sections) [APP-011] and the Tunnel Limits of Deviation Plan [APP-019], subject to the limits of deviation established by article 7 of the draft DCO</p>

[APP-020].

The design of the Scheme elements referred in the representation will be developed through the detailed design stage of the project. The detail in the application documents of each of the design elements as raised in the relevant representation is set out below:

- Photomontages and CGI visualisations have been presented within the LVIA Chapter (Chapter 7 [APP-045] and Cultural Heritage Chapters (Appendix 6.9 [APP-218] of the ES for the Till Valley, green bridges and the tunnel portal. Design and visual representations will be developed through the detailed design process. The further detailed design of the Scheme will be sensitive to its WHS context, following Highways England's guide 'The Road to Good Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf). In so far as it impacts on the WHS, the design of the key elements of the Scheme will be developed in consultation with Wiltshire Council.
- In the context of signage, the Scheme has committed to no signage or other vertical installations (such as CCTV) above the top of the cutting and no lighting of signs at the western end of the Scheme in order to protect the WHS's OUV (see OEMP, D-CH8). To minimise the visibility of new infrastructure within the WHS signage and other highways installations will sit completely within the approach cuttings and not extend above them. Appropriate signage and infrastructure would be provided outside the WHS to manage traffic through the corridor.
- Fencing in the WHS shall be developed in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council, as secured in the Outline Environmental Management Plan (OEMP) [APP-187] (D-CH14). During construction, the main works contractor shall consult with the relevant bodies to determine the type of construction boundary fencing to be used within the WHS or within the setting of the WHS (OEMP MW-CH3). The OEMP is secured under paragraph 4 of Schedule 2 within the draft

	<p>DCO [APP-020].</p> <p>Other key design elements that are secured via the OEMP include:</p> <ul style="list-style-type: none"> • D-CH2 and D-CH3 which require the redundant sections of the road surface to the existing A303 and A360 (including the existing Longbarrow Roundabout) to be broken out, save to the extent they are required for public rights of way; • D-CH4 – requires Green Bridge Four to be approximately 150m wide; • D-CH5 – which requires the western approach to the tunnel to be in cutting to a minimum 7m depth with vertical retaining walls; • D-CH6 and D-CH7 – which require cut and cover tunnels extending eastwards and westwards from the bored tunnel; • D-CH9, D-CH10, D-CH11 and D-CH12 - which taken together limit the use of highway lighting within the WHS and require improved lighting at Countess Roundabout. <p>In the context of the heritage assessment, the impacts of utilities have been considered within ES Chapter 6 Table 6.11 [APP-044] and Chapter 15 [APP-053] and Appendix 15.2 [APP-183]. MW-CH5 and PW-CH5 of the OEMP [APP-187] secure the obligation to avoid potentially sensitive archaeological remains wherever possible or provide appropriate mitigation in consultation with WCAS (for remains outside of the WHS) where impacts are unavoidable in respect of utility/service corridors.</p>
<p>It is noted that Schedule 2 of the draft DCO sets out the requirements and Requirement 5 refers to the need for all works to be done according to a Detailed Archaeological Mitigation Strategy (DAMS). The Council is concerned that this requirement does not refer to the need to include a detailed archaeological and heritage outreach and education programme as part of the DAMS.</p>	<p>The Outline Archaeological Mitigation Strategy (OAMS) [APP-220], ES Appendix 6.11, on which the Detailed Archaeological Mitigation Strategy (DAMS) will be based, sets out the requirements for post-excavation assessment, analysis, reporting, and dissemination of findings. As set out in Section 4.3, this includes discussion on heritage outreach and education programmes, including opportunities for public archaeology, use of media outlets to keep the public and academic community informed, and the use of site-based interpretation panels and the displays of finds at selected venues. The outline strategy as set out in the OAMS being developed into a detailed Public Archaeology and Community Engagement Strategy which will be presented in the DAMS. The DAMS will be developed prior to the end of the examination in consultation with the Heritage Monitoring</p>

<p>The main concern is that the current version of the EIA is not as complete and robust as it could be as the archaeological field evaluation was only completed after this document was submitted and the various reports from that have not all been finalised. Highways England have committed to producing an Addendum to the EIA chapter on cultural heritage once this information is available. Consequently, some of this chapter and the associated figures and plans will need to be amended (e.g. 6.6 which does not include findings from the latest phases of evaluation of the western bypass). This situation is not adequately reflected in the relevant paragraph on assumptions and limitations (6.4.1 f).</p>	<p>Advisory Group, the membership of which includes Wiltshire Council.</p> <p>A full and comprehensive programme of archaeological evaluation surveys has been completed. The results of the archaeological evaluations were either considered, or confirm the survey data considered, for the submission of the ES and the HIA. The archaeological evaluation reports confirm the archaeological baseline and the approach to mitigation. These have been reviewed in line with the ES tables that detail the impacts and the significance of effects (Section 6.9 in Chapter 6 [APP-044] and Appendix 6.8 [APP-217]). No additional significant effects have been identified. The archaeological evaluation reports will be submitted to the Examination by Deadline 1.</p>
<p>Another concern is that the key headline from the Cultural Heritage chapter is that only a limited number of archaeological features will be impacted by the Scheme. Section 6.9.24 states only 11 non-designated heritage assets will be adversely impacted. It should have been stated that this is the minimum number of groups of features that will be directly impacted. The Council believes that using this figure is unhelpful and imprecise. Many more than this will be impacted as this figure is derived from the evaluation phase of the Scheme which has employed a sampling approach to evaluation trenches. It is understood that the Scheme has been carefully designed to where possible avoid areas of known archaeological features, but many features are likely to be revealed during the mitigation phase, the stripping of the road either side of the tunnel portals will undoubtedly reveal further non-designated assets that will be adversely impacted. Moreover, archaeological features are also likely to be revealed and excavated during preliminary works such as utility installation, the details for which have not been seen. This should be made clearer in the EIA chapter.</p>	<p>The Environmental Statement reports both the significant and the non-significant Cultural Heritage effects within ES Chapter 6, Cultural Heritage [APP-044]. Permanent significant effects from the construction of the Scheme are reported in sections 6.9.24 to 6.9.29 of the ES and Table 6.11, whilst sections 6.9.30 – 6.9.32 [APP-044] and Appendix 6.8 [APP-217] report the non-significant effects. The statement at 6.9.24 and the NTS refer to the significant effects reported in the ES. Highways England considers the results of the assessment have been presented in an appropriate manner.</p> <p>Highways England note Wiltshire Council Archaeology Service’s (WCAS) concern that further archaeological features will be revealed in future works. The assessment in the ES is based on a comprehensive programme of archaeological evaluation designed in collaboration with heritage stakeholders, including WCAS. The evaluation results provide a robust basis for assessment of the likely significant effects of the Scheme. This follows established good practice and planning policy guidance.</p> <p>As acknowledged by Wiltshire Council, the preferred route was carefully chosen to avoid known archaeological remains. A comprehensive programme of archaeological evaluation surveys (see ES Chapter 6 Cultural Heritage, paragraphs 6.6.13 – 6.6.52), covering the entire red line boundary of the Scheme, has informed the Scheme being designed in a way that has limited archaeological impacts where this is practicable. Examples of how the design has been developed to limit impacts on archaeology include the choice of a northern bypass of Winterbourne</p>

	<p>Stoke, the reduced footprint and land take for Rolleston Corner, and the design and placement of the western and eastern tunnel portals and approaches in areas that have been shown to have limited archaeological remains within their footprint. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9. Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction, to avoid, as far as is practicable, previously unknown archaeological remains being uncovered during construction. The Outline Archaeological Mitigation Strategy (OAMS) [APP-220] also identifies areas to be protected in-situ. A Detailed Archaeological Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group (which comprises Wiltshire Council Archaeology Service, Historic England, National Trust, and English Heritage), and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020].</p>
<p>The Outline Archaeological Mitigation Strategy (OAMS) (Appendix 6.11) has been considered in detail. However, as this was not available for review prior to submission with the DCO, the Council has some concerns.</p> <p>It is stated that this document is a draft which will be consulted on by the heritage stakeholders from which a detailed strategy (DAMS) will be developed. Section 1.2.1 says this will happen prior to the preliminary works starting. The timing of this is questioned, as the Council considers it essential that the DAMS is agreed before consent for the Scheme is given.</p> <p>In places the OAMS is not detailed enough (e.g. lacking in detail about outreach and education provision) and the document will need updating with the results of the recently completed archaeological evaluations. Additionally, there needs to be more cross referencing and links between this document and the OEMP (Appendix 2.2).</p>	<p>Highways England notes Wiltshire Council's concerns.</p> <p>A Detailed Archaeological Mitigation Strategy (DAMS) will be developed prior to the end of the examination, from the Outline Archaeological Mitigation Strategy (OAMS) [APP-220] which was submitted with the DCO application, in consultation with Wiltshire Council Archaeology Service. Initial discussions on the DAMS have commenced with Wiltshire Council and will be ongoing throughout the Examination process in order to finalise the document. The DAMS is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order (DCO) [APP-020]. The DAMS will be informed by the completed evaluation survey reports referred to. The DAMS will contain cross-references to the OEMP [APP-187] (which contains the OAMS as an annex), where relevant.</p>
<p>A detailed and comprehensive Heritage Impact Assessment (HIA) has been prepared in accordance with the agreed scoping report that specifically assesses the impact of the Scheme on the OUV of the WHS. The assessment clearly shows the large benefits of the removal of the A303 from the central part of the WHS.</p>	<p>Highways England welcomes the comments by Wiltshire Council Archaeology Service that the Heritage Impact Assessment (HIA) is detailed and comprehensive and has been prepared in accordance with the agreed HIA scoping report. The HIA specifically assesses the impact of the Scheme on the OUV of the WHS. Highways England also welcomes Wiltshire Council Archaeology Services comment that the Scheme will</p>

	bring large benefits to the central part of the WHS.
<p>Overall the Scheme is assessed as having a slight beneficial effect on the setting of the OUV of the WHS. Whilst, this overall conclusion is not necessarily disagreed with, the Council thinks more could be done to mitigate the adverse impacts of the dual carriageway in cutting on the setting of asset groups in the western part of the WHS, especially on the Winterbourne Stoke and Diamond Group (see paragraphs 53 to 54 below).</p> <p>Adverse impacts to setting of some of the asset groups are indicated, particularly the Western edge of the WHS where the Western Portal and deep cutting are. From the summary of anticipated impacts in Table 1, the Council is especially concerned with the potential slight adverse impact on Asset Group (AG) 13, the Diamond Group. WCAS are also concerned about the adverse impact on AG 12, the Winterbourne Stoke Group, and AG 19, Normanton Down. These groups have highly significant Neolithic long barrows, all of which display attributes of OUV. The impact of the Scheme on the Winterbourne Stoke Group is shown as being moderate beneficial. Our view is that this should be assessed as slight adverse as in the Diamond Group. This is supported by our interpretation of the relevant photo montages and figures in the Landscape Chapter.</p>	<p>Highways England met with WCAS on the 12th December 2018 to discuss the Statement of Common Ground and review the photomontages and CGIs that were submitted with the ES Chapter 6, Appendix 6.9 [APP-218] and explained the views in more detail in order to try to alleviate Wiltshire Council's concerns and correct any misunderstandings.</p> <p>Highways England, however, disagree with Wiltshire Council's stance. Highways England have designed a scheme that removes the surface A303, and the accompanying sight and sound of traffic on it from a large proportion of the WHS enabling beneficial change to the setting of many monuments and asset groups that contribute to the OUV of the WHS, particularly within the central part of the WHS surrounding Stonehenge. The Scheme has been sensitively designed with the use of a 2 mile long tunnel, retained deep road cuttings, essential chalk grassland mitigation to enable landscape integration, a 150m long Green Bridge No. 4 to enable visual and physical landscape connectivity and public access, canopies and hidden tunnel portals within the WHS landscape.</p> <p>The Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole. This takes into account that of the seven attributes of OUV for the WHS, whilst the Scheme will have a slight adverse effect on two of those attributes, it will have a beneficial effect on the remaining five (being a slight beneficial effect on 3 of the attributes, a large beneficial effect on one, and a very large beneficial effect on one). This conclusion also takes into account that the Scheme will have a slight beneficial effect on the authenticity and integrity of the WHS. Overall, the OUV of the WHS would be sustained.</p> <p>With reference to AG12 Winterbourne Stoke Crossroads Barrows, Highways England disagree with Wiltshire Council's conclusion that the impacts from the Scheme on this asset group should be assessed as slight adverse as both the A303 and the A360, including the existing Longbarrow Roundabout, will be removed from immediately adjacent to the asset group. The A303 will move 150m to the south and be built in cutting to</p>

remove the sight and sound of traffic from immediately adjacent to the asset group. The benefits of this are clearly demonstrated by the photomontages and CGIs presented in the ES Chapter 6, Appendix 6.9 [APP-218] (Figure 4, Figure 5 and Figure 7).

With regards to AG13 Diamond Group, the A360 currently bisects the group and the A303 additionally severs the group from AG12 Winterbourne Stoke Crossroads Barrows to the north. The Scheme design removes traffic and severance from within the asset group by realigning the A360 and Longbarrow junction further to the west. Green Bridge No. 4 maintains visual and physical landscape connectivity with AG12 Winterbourne Stoke Crossroads Barrows to the north and access between the two groups via new NMU routes, and this combined with the essential chalk grassland mitigation, improves the visitor's ability to appreciate the setting, in the context of reduced views and sounds of traffic.

Regarding AG19 Normanton Down Barrows, the Scheme would remove the existing A303 surface road to the north of the asset group, which severs its relationship with Stonehenge as well as many other asset groups to the north of the A303, including AG12 Winterbourne Stoke Crossroads Barrows. The Scheme would restore the setting of much of the AG19 Normanton Down Barrows, its sense of place, and visitor's ability to appreciate them within a seamless landscape, noting that long distance views from the northern end of the asset group will include minor intrusion from the western approach cutting and Green Bridge No. 4. Amongst other benefits of the restored setting of AG19 Normanton Down Barrows would be the enhanced access, enabling an uninterrupted traverse between Stonehenge and the Normanton Down Barrows along Byways 11 and 12. The removal of the adverse visual and audible impacts of traffic would be beneficial to the setting of the asset group as a whole. Views from numerous individual monuments within the asset group would be improved, and compromised sightlines restored. These include key views, including those between the Sun Barrow and Stonehenge, and between Stonehenge and the core of the Normanton Down asset group. From the core of the group, traffic would not be visible, while traffic noise would be significantly reduced.

	<p>Highways England will, however, continue to work with Wiltshire Council to alleviate their concerns, and consult with them during the development of the detailed design.</p>
<p>Whilst the proposed green bridge (150m in width) east of the current Longbarrow junction and its proposed location does afford some mitigation, the Council has concerns that it is not sufficient to mitigate potential adverse visual impacts caused by the cutting on key monument groups with attributes of OUV, most notably the Winterbourne Stoke, Diamond Group and Normanton Down Group. We would encourage Highways England to explore further design options to help minimise the adverse impact or extend the tunnel.</p> <p>The Council believes that extending the tunnel (either bored or cut and cover) within the WHS boundary could further minimise impact on the OUV. Section 3.3.61 of the EIA outlines alternative options that were explored and dismissed, including extending the tunnel which is stated as being dismissed on cost grounds but does not give any figures. WCAS do not find this section detailed enough to satisfy concerns, given the adverse impact to the western part of the WHS identified in the HIA and EIA.</p>	<p>Highways England disagree with Wiltshire Council's stance. Along with considerations of cost, the location and design of the tunnel portals have been optimised in terms of the natural topography of the area, impact within the WHS and the extent of benefit that will be secured by one of the key aims of the Scheme which is to remove the sight and sound of the A303 traffic from much of the WHS landscape. With accompanying mitigation, the assessments show that the preferred solution is a 2-miles (3.3km) long tunnel extending between portals located adjacent to the existing A303 to the east of The Avenue and to the west of Normanton Down.</p> <p>The Preferred Route Announcement (PRA) by the Secretary of State in September 2017 was based on a 2.9km long twin bored tunnel. The western portal was located south of the existing A303 and northwest of Normanton Gorse and the eastern portal to the north of the A303 and east of the Avenue. Since the PRA, during the Scheme development, and in response to consultation responses, the applicant has amended the Scheme to extend the tunnel. Two changes were made to the location of the western portal which resulted in a 300m extension to the tunnel:</p> <ul style="list-style-type: none"> - the end of the bored tunnel was moved 100m west to avoid impact on a scheduled barrow (NHLE No. 1010832 – Bowl barrow south of the A303 and north west of Normanton Gorse) that contributes to the OUV of the WHS; and - a 200m cut-and-cover extension, or canopy, was added for improvement in landscape and visual connectivity and tranquillity within the WHS. <p>At the eastern end a cut-and-cover extension of 85m has been added to suit the topography for improvement in landscape and visual connectivity and tranquillity within the WHS.</p> <p>Further westwards extensions of the tunnel were ruled out because of</p>

topographical and technical constraints, and because they would not deliver sufficient additional benefits to justify the additional cost. Highways England have designed a scheme that removes the surface A303, and the accompanying sight and sound of traffic on it from a large proportion of the WHS enabling beneficial change to the setting of many monuments and asset groups that contribute to the OUV of the WHS, particularly within the central part of the WHS surrounding Stonehenge. The Scheme has been sensitively designed with the use of a 2 mile long tunnel, retained deep road cuttings, essential chalk grassland mitigation to enable landscape integration, a 150m long Green Bridge No. 4 to enable visual and physical landscape connectivity and public access, canopies and hidden tunnel portals within the WHS landscape.

The Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole. This takes into account that of the seven attributes of OUV for the WHS, whilst the Scheme will have a slight adverse effect on two of those attributes, it will have a beneficial effect on the remaining five (being a slight beneficial effect on 3 of the attributes, a large beneficial effect on one, and a very large beneficial effect on one). This conclusion also takes into account that the Scheme will have a slight beneficial effect on the authenticity and integrity of the WHS. Overall, the OUV of the WHS would be sustained.

With reference to AG12 Winterbourne Stoke Crossroads Barrows, both the A303 and the A360, including the existing Longbarrow Roundabout, will be removed from immediately adjacent to the asset group. The A303 will move 150m to the south and be built in cutting to remove the sight and sound of traffic from immediately adjacent to the asset group. The benefits of this are clearly demonstrated by the photomontages and CGIs presented in the ES Chapter 6, Appendix 6.9 [APP-218] (Figure 4, Figure 5 and Figure 7).

With regards to AG13 Diamond Group, the A360 currently bisects the group and the A303 additionally severs the group from AG12 Winterbourne Stoke Crossroads Barrows to the north. The Scheme design removes traffic and severance from within the asset group by realigning the A360 and Longbarrow junction further to the west. Green Bridge No. 4 maintains

	<p>visual and physical landscape connectivity with AG12 Winterbourne Stoke Crossroads Barrows to the north and access between the two groups via new NMU routes, and this combined with the essential chalk grassland mitigation, improves the visitor's ability to appreciate the setting, in the context of reduced views and sounds of traffic.</p> <p>Regarding AG19 Normanton Down Barrows, the Scheme would remove the existing A303 surface road to the north of the asset group, which severs its relationship with Stonehenge as well as many other asset groups to the north of the A303, including AG12 Winterbourne Stoke Crossroads Barrows. The Scheme would restore the setting of much of the AG19 Normanton Down Barrows, its sense of place, and visitor's ability to appreciate them within a seamless landscape, noting that long distance views from the northern end of the asset group will include minor intrusion from the western approach cutting and Green Bridge No. 4. Amongst other benefits of the restored setting of AG19 Normanton Down Barrows would be the enhanced access, enabling an uninterrupted traverse between Stonehenge and the Normanton Down Barrows along Byways 11 and 12. The removal of the adverse visual and audible impacts of traffic would be beneficial to the setting of the asset group as a whole. Views from numerous individual monuments within the asset group would be improved, and compromised sightlines restored. These include key views, including those between the Sun Barrow and Stonehenge, and between Stonehenge and the core of the Normanton Down asset group. From the core of the group, traffic would not be visible, while traffic noise would be significantly reduced.</p> <p>Highways England will, however, continue to work with Wiltshire Council to alleviate their concerns, and consult with them during the development of the detailed design.</p>
<p>Oatlands Hill, on the west part of the Scheme just outside the WHS, is a sensitive part of the Scheme in terms of buried archaeology and potential landscape impacts. The EIA acknowledges the Scheme is likely to have a moderate adverse impact on the landscape here. This is the location of the proposed new junction and dumbbell roundabout. The archaeological evaluation identified evidence of Bronze Age and Iron Age settlement including a C-shaped enclosure. Currently the double roundabout</p>	<p>Highways England acknowledges Wiltshire Council Archaeology Service's (WCAS) concerns regarding the C-shaped enclosure at Oatlands Hill. The design of the proposed Scheme was considered appropriate, as no other design options were considered to be reasonable alternatives for the following reasons.</p> <p>Moving the junction 300m to the west.</p>

<p>infrastructure is proposed to be located on top of this. Although the archaeological remains here are likely not to be of national significance, if possible, consideration should be given to designing the layout of the new infrastructure here to minimise impact on these remains, preserving as much of them as possible.</p>	<p>This brings the junction too close to the village of Winterbourne Stoke and would impact on traffic flows. This option was rejected for these reasons;</p> <p>Shifting the South Dumbell 100m to the east This brings the roundabout too close to the WHS and the east and west off slips would require more land take within the WHS. This option was rejected for these reasons; and</p> <p>Shifting the South Dumbell 170m to the west This option, though feasible, would result in a skewed bridge (increasing costs), departures from standards for visibility reasons in both roundabout approaches and exits and would require the construction of a 160m long retaining wall for the west bound offslip, which would be 12m high at its highest point and would be visible from the WHS (AG12 Winterbourne Stoke Crossroads Barrows). This option was rejected for these reasons.</p> <p>The archaeological remains will be archaeologically excavated and recorded during the preliminary works phase and in advance of construction. A Detailed Archaeology Mitigation Strategy (DAMS) will be developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group prior to the end of the Examination and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order [APP-020].</p>
<p>It is welcomed that no street lighting has been proposed for the area of the new junction, but the Council is still concerned about the possibilities of light spillage and adverse impacts on dark skies within the vicinity of the WHS boundary.</p>	<p>Highways England acknowledges Wiltshire Council's concerns and would refer WC to several documents within the Environmental Statement. The first, Chapter 2 [APP-040], page 2-13, sets out within the 'Lighting' section that the majority of the Scheme would not be lit. There would be no lighting within the WHS beyond that necessary within the tunnel and beneath the c. 150-metre-wide Green Bridge No. 4 (operating during day time only). There would be no lighting within the open cutting, and tunnel lighting would be designed to minimise light spill outside of the tunnel portals. There would be no roadside lighting at the new Longbarrow Junction, and the improved Countess junction would utilise new directional roadside lighting to minimise light spill along with screening provided by acoustic screens on the flyover. The mainline of the road at Longbarrow Junction will also be set in deep cutting limiting light spill in to the landscape from car headlights and tail lights.</p>

	<p>The second document is the Landscape and Visual Impact Assessment [APP-045] which includes a qualitative night time assessment and concludes in paragraph 7.9.129 that there would be a substantial reduction in lighting from vehicles within the WHS as they would be largely contained within the tunnel and in combination with the removal of existing lighting at Longbarrow Junction there would be a moderate beneficial (significant) effect to the character of the night sky within the WHS.</p> <p>We consider that the Scheme presents significant improvements over the current lighting and dark sky situation, where both Countess and Longbarrow junctions on the WHS boundary are brightly lit, such that there would not be adverse impacts to the dark skies within the vicinity of the WHS boundary.</p> <p>The delivery of the Scheme lighting is secured in the Outline Environmental Management Plan (OEMP) [APP-187 (D-CH9 to D-CH12)], and paragraph 4 of Schedule 2 of the DCO [APP-020] requires the Scheme to be carried out in accordance with the OEMP.</p>
<p>The imposition of restrictive covenants on ground works on land above the tunnel is referred to in the draft DCO, 4.3 the Book of Reference and the Land Plans (2.2). The Council has concerns over this and need to have a detailed agreement drawn up as it may restrict the ability to undertake archaeological investigations in a core part of the WHS.</p>	<p>As noted in the Statement of Reasons [APP-023], restrictions are required above the tunnel in order to secure protection of the tunnel from potentially conflicting future development and works that might jeopardise the structural integrity of the tunnel. Highways England acknowledges Wiltshire Council's concerns regarding the tunnel restriction areas and is undertaking further work to provide details of the type of restrictions required. Highways England will continue to engage with Wiltshire Council on this issue.</p>
<p>Public Protection Considerations – General</p>	
<p>Following review of the DCO documentation, primarily focused on the Environmental Statement and specifically the Outline Environmental Management Plan (OEMP), the Council is in the process of commissioning an external review of the air quality, noise and vibration reports and models for both the construction and operational phases. This may raise additional issues which will need to be addressed during the Examination phase.</p>	<p>Noted. Highways England looks forward to continuing engagement with Wiltshire Council through the Examination process.</p>

<p>Further details are required of the measures to divert the Esso pipeline and environmental protection during this process referenced in Chapter 2 of the Environmental Statement (paragraph 2.4.40).</p>	<p>The proposals for the Esso pipeline are set out in Chapter 2 of the ES [APP-040] at paragraphs 2.4.40 - 2.4.41 and shown indicatively on Figure 2.7 [APP-061].</p> <p>Whilst the Outline Environmental Management Plan (OEMP) [APP-187] does not specifically mention the Esso Pipeline, it is addressed through this document. There are two REAC tables: 3.2a for preliminary works and 3.2b for main works. The diversion of the Esso pipeline falls within the preliminary works being the diversion and laying of underground apparatus (see paragraph 1.2.6 of the OEMP). As such, all Esso pipeline works would be undertaken in accordance with the relevant measures contained in REAC table 3.2a, which deals with public protection measures such as air quality, noise and drainage. Compliance with the OEMP is secured through paragraph 4 of Schedule 2 of the draft Development Consent Order (DCO) [APP-020].</p>
<p>With regard to the 2010 and 2009 geology and soil reports referred to in paragraphs 10.6.63 and 10.6.66 of Chapter 10 of the Environmental Statement, the Council requires copies of these to further understand the comments and conclusions drawn.</p>	<p>Highways England is engaging with Wiltshire Council on this matter and will be providing Wiltshire council with the requested reports during the Examination.</p>
<p>It is queried whether additional measures to the OEMP are proposed at locations with large adverse cumulative effects (table 15.3 of Chapter 15 of the Environmental Statement).</p>	<p>For the significant cumulative effects summarised in table 15.3 of the ES [APP-053], the combined effect is equivalent to the “worst case” effect already identified for a single environmental topic. In each of these cases, no further mitigation measures are considered practicable above the measures outlined in the OEMP [APP-187]. Highways England will continue to discuss this issue with Wiltshire Council over the course of the Examination.</p>
<p>Considering the responsibilities of the Environmental Manager role detailed within the OEMP, it is queried whether any overlap is foreseen between the CEMPs for different contractors. Furthermore, the Council would like to see a proactive requirement on this role to report all or any transgressions.</p>	<p>Given the reference to multiple contractors, it is assumed that the Relevant Representation refers to the Preliminary Works CEMPs. Each Environment Manager will be responsible for the scope of works relevant to their Preliminary Works package, so it is not envisaged that there would be an overlap between roles. Highways England will coordinate the works undertaken by each of the Preliminary Works Environment Managers and monitor any transgressions. With regard to the Main Works contract, a single Environment Manager will be appointed by the Contractor to have responsibility over all the main works, including any works undertaken by sub-contractors.</p>

<p>Clarity is required on whether the Community Relations Manager (CRM) as detailed within the OEMP is intended to be the single point of contact for this Scheme.</p>	<p>Highways England remains the single point of contact for Wiltshire Council. The Community Relations Manager (CRM) is intended to be the single point of contact for community related stakeholders e.g. the public and landowners.</p>
<p>With respect to the core working hours referenced in the OEMP, it is requested that any exceptions are agreed in writing by Wiltshire Council.</p>	<p>Such a process is already provided for within the OEMP [APP-187] at items PW-G4 and MW-G12 where subject to the exception created by MW-G14, it is stated that exceptions to the core working hours must be agreed with Wiltshire Council pursuant to a section 61 consent.</p>
<p>In MW-G12 of table 3.2b in the OEMP, there is a contradiction with the core hours specified in PW-G4. Furthermore, there is no definition of summer and winter in earthworks working hours.</p>	<p>The hours referred to within PW-G4 are applicable to the preliminary works only, MW-G12 deals with the main works. These were drafted to be in line with Wiltshire Council's standard hours for noisy activities during construction. Due to the predominantly rural nature of the Scheme and limited receptors in the majority of locations, it was deemed that these hours were too restrictive for the majority of the main works, therefore the hours referred to within MW-G12 have been increased to allow for extended working periods. Sensitive locations, identified within MW-G13 for site specific working hours, are restricted to the same hours as those identified within PW-G4.</p> <p>Highways England acknowledges that there is no definition of summer and winter in the OEMP and will define these terms during the course of Examination.</p>
<p>The use of chainage for locations is unclear in MW-G13 of table 3.2b in the OEMP.</p>	<p>Chainages are shown on the Engineering Plan and Profile [APP-058] drawings, ES Figure 2.2. It is considered that this is more precise than referring to generic place names.</p>
<p>The Council foresees a potential problem with the additional working hours at Countess Roundabout flyover (MW-G14 of table 3.2b of OEMP) and queries whether there is a conflict with MW-G13.</p>	<p>It is recognised that additional working hours, as stated in MW-G14, may be required at Countess Roundabout which are outside of those specified within MW-G13. MW-G13 states that an approach to seeking approval for any variations to site specific working hours will be included within the CEMP following discussion with Wiltshire Council. There is therefore not considered to be a conflict between the two requirements, as there is a process for varying site-specific working hours, as necessary. It is also noted that the exceptions in G14 are stated to be able to be used only for reasons of safety or operational necessity.</p>
<p>It is suggested that "c) works notices to be notified to Wiltshire Council" should be added to MW-G31 of table 3.2b of the OEMP. This is also</p>	<p>Highways England will include reference to Wiltshire Council item c) of MW-G31 of table 3.2b of the OEMP in the next iteration of the OEMP,</p>

referenced in paragraph 10.2.1 of Appendix 5.4 to the Environmental Statement.	which will be provided during the course of Examination.
In MW-WAT7 of table 3.2b of the OEMP, consultation should be with Wiltshire Council as concrete batching is a Local Authority permitted process unless exempted. This is also relevant to section 3.2.1 of Appendix 5.4 of the Environmental Statement.	It is agreed that Wiltshire Council should be consulted. Highway England's contractor will apply for the permit in due course when sufficient detail to satisfy the requirements of the permitting regime are available.
It is queried whether the satellite compounds will have mains power or generators. Paragraphs 3.4.1 and 10.3.2 of Appendix 5.4 to the Environmental Statement refer.	The eastern satellite compound (identified as being located at Countess Interchange within paragraph 3.4.1 of Appendix 5.4 to the Environmental Statement) will be mains powered upon connection of the proposed supply. Generator power may be required for a short period, should compound set-up require power prior to the mains connection being available. Generators will be used to power the western satellite compound. Additional power would be required during heavy operations (e.g. Tunnel Boring Machinery) at Longbarrow West and Countess compounds, for which the power supply from the proposed generators would be insufficient. It is understood that these activities would not be undertaken until the mains power is connected.
With regard to table 10.1 of Appendix 10.5 of the Environmental Statement, Wiltshire Council and the Environment Agency should receive reports on further ground investigation works, together with any mitigation proposals (in writing prior to mitigation being undertaken).	Highways England will include provision of any reports on further ground investigation works regarding contamination and associated mitigation proposals, as appropriate, in the next iteration of the OEMP, which will be provided during the course of Examination.
Public Protection Considerations – Air Quality	
It is unclear from the information contained within paragraph 2.4.53 of Chapter 2 of the Environmental Statement whether any water from the Slurry treatment plant will be transported by tanker to the Salisbury Waste Treatment Works. Clarity is also required on whether this option has been included within the HGV movement calculation, noise and air quality modelling.	These trips are not explicitly included in the air quality or noise modelling as the primary method for management of wastewater would be discharge back to the ground, as set out in ES Chapter 2 [APP-040], paragraph 2.4.53, not via the Salisbury Waste Treatment Works. However, the traffic model on which the air quality modelling was based included an allowance for additional HGV movements, to provide tolerance for uncertainties, including, for example, the need to transport wastewater off-site, should it be required.
The arising referenced in 2.4.54 of Chapter 2 of the Environmental Statement must be spread and managed so as not to cause a statutory dust nuisance.	Measures for the management of dust are set out in the Outline Environmental Management Plan (OEMP) [APP-187] (MW-AIR1, MW-AIR2, and MW-AIR4), as secured through paragraph 4 of Schedule 2 of the draft Development Consent Order.

<p>BPM referenced in Section 3.2a (PW-AIR1) of the OEMP should be extended to include “f) Other means as may be required.</p>	<p>This issue has been agreed between Highways England and Wiltshire Council, the proposed text will be included in further iterations of the OEMP. Agreement on this issue will be captured in the Statement of Common Ground being prepared between the two parties, which will be made available to the Examination in due course.</p>
<p>With regard to the final paragraph in MW-AIR24 in table 3.2b of the OEMP, it is suggested that “and agreed” is added to the reporting of Air Quality monitoring with the Council.</p>	<p>This matter is currently under discussion between Highways England and Wiltshire Council. Discussion is being recorded through the Statement of Common Ground, which will be made available to the Examination in due course.</p>
<p>The Council would appreciate further information on the proposed haul routes (table 5.4.5 of Appendix 5.4 of the Environmental Statement). Furthermore, the Council queries the Berwick St. James locations and proximity to haul routes (i.e. Pelican Inn location).</p>	<p>As per the below response, the title of table 5.4.5 of Environmental Statement Chapter 5, Air Quality Appendix 5.4 [APP-043] should be “<i>Sensitive receptors located within 200m of the Order Limits of the Scheme</i>”. Highways England is liaising with Wiltshire Council regarding their location queries as part of discussions on the Statement of Common Ground between the parties.</p>
<p>Information within table 5.4.6 of Appendix 5.4 to the Environmental Statement appears to contradict information in table 5.4.5 of the same document regarding location adjacent to haul routes.</p>	<p>The title of table 5.4.5 of Environmental Statement Appendix 5.4 [APP-193] should be “<i>Sensitive receptors located within 200m of the Order Limits of the Scheme</i>”.</p>
<p>In section 11.1.1 of Appendix 5.4 of the Environmental Statement, reference should be made to IAQM Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites (October 2018, Version 1.1).</p>	<p>Air quality monitoring will be based on IAQM guidance, including the document referenced by Wiltshire Council. The requirement for adherence to Best Practicable Means (BPM) and industry best practice, which includes IAQM Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites, is secured through item MW-AIR1 of the OEMP, which in turn is secured through paragraph 4 of Schedule 2 of the draft DCO [APP-187]. Item MW-AIR4 sets out the requirement for air quality monitoring to take place.</p>
<p>With regard to Appendix C of Appendix 12.1 of the Environmental Statement, clarification is required regarding the reference to Quidhampton and Severe Adverse effects on Salisbury AQMAs. Urgent clarification is required if there is predicted to be severe adverse effects at the listed AQMAs receptors.</p>	<p>Appendix 12.1 of the Environmental Statement sets out the different options considered by Highways England for dealing with the disposal of tunnel arisings. This included both on-site and off-site options, and concludes that off-site options were not preferable, due in part to their environmental impacts. Appendix C illustrated the environmental impacts of off-site options such as Quidhampton Quarry and recognised doing so would cause adverse effects to the Salisbury AQMAs.</p> <p>The predictions were undertaken using basic screening calculations for</p>

	<p>residential receptors to inform on the viability of offsite disposal. The specific receptor tested with a small change in air quality at concentrations above the NO2 air quality objective was in the Salisbury AQMA at Grid Reference: 412604, 130663 (property adjacent to Halfway House public house). Following the conclusions of Appendix 12.1 and as set out in ES Chapter 2, The Proposed Scheme [APP-040] off-site disposal is not planned and instead disposal is planned in the area east of Parsonage Down.</p>
<p>Public Protection Considerations – Noise and Vibration</p>	
<p>Whilst vibration levels of 1.0 mms-1 are identified as causing complaint in sections 9.4 and 9.15 of Chapter 9 of the Environmental Statement, no suggestion is made as to setting a level trigger alert which is recommended by the Council (see comments made in paragraphs 84 and 88 above).</p>	<p>Highways England acknowledges the representation made by Wiltshire Council and will progress this matter in discussion with them with a view to reaching agreement on the issue which will be captured in the Statement of Common Ground being prepared between the two parties, which will made available to the Examination in due course.</p>
<p>The property Lindisfarne in Ratfyn Road is identified in section 9.18 and paragraph 9.9.49 of Chapter 9 of the Environmental Statement as exceeding the noise insulation regulations assessment. The Council requires confirmation of the timescale for a more detailed assessment to be conducted.</p>	<p>The timescales set out in the Noise Insulation Regulations (1975) (https://www.legislation.gov.uk/ukxi/1975/1763/contents/made), a maximum of 6 months from Scheme opening, will be followed for the completion of a full Noise Insulation Regulations Assessment at all properties within 300m of the Scheme.</p>
<p>The Council recommends that vibration levels of 1.0 mms-1 should be set as a level trigger alert to Wiltshire Council and affected residents (PW-NO14 of table 3.2a and MW-NO13 of table 3.2b of OEMP). (See paragraph 103 above).</p>	<p>Highways England acknowledges the representation made by Wiltshire Council and will progress this matter in discussion with them with a view to reaching agreement on the issue which will be captured in the Statement of Common Ground being prepared between the two parties, which will made available to the Examination in due course.</p>
<p>In MW-NO15 of table 3.2b in the OEMP, it is requested that a requirement to notify Wiltshire Council if predicated vibration exceeds 1.0 mms-1 is added.</p>	<p>Highways England acknowledges the representation made by Wiltshire Council and will progress this matter in discussion with them with a view to reaching agreement on the issue which will be captured in the Statement of Common Ground being prepared between the two parties, which will made available to the Examination in due course.</p>
<p>The Council should be consulted on the Noise and Vibration Management Plan referenced in NO13 and Section 9.8 of the OEMP.</p>	<p>As set out in the Outline Environmental Management Plan (OEMP) [APP-187], the CEMP, to which the Noise and Vibration Management Plan will be appended [MW-G7], will be developed in consultation with Wiltshire Council [MW-G7]. The OEMP is secured through paragraph 4 of Schedule 2 of the draft DCO [APP-020].</p>

<p>It is noted that SOAEL exceeded at locations C4, C5, C6, C7, C8, C9, C10, C11, C16 and C18 of the Section 2 tables contained within Appendix 9.2 of the Environmental Statement.</p>	<p>Agreed. Based on the construction of the Scheme as described in the Chapter 2 of the ES [APP-040], construction noise SOAEL would be exceeded at these receptors during some periods of the construction works. It is noted however that this represents a conservative assessment as it does not include the implications of specific localised mitigation measures such as temporary site hoardings, that would be developed by the contractor at the detailed design stage.</p>
<p>The Council suggests potential relocation for Stonehenge Cottages inhabitants over the 2 x 7 days construction periods (table 1.1 of Appendix 9.5 of the Environmental Statement).</p>	<p>Highways England acknowledges the representation made by Wiltshire Council and will progress this matter in discussion with them with a view to reaching agreement on the issue which will be captured in the Statement of Common Ground being prepared between the two parties, which will made available to the Examination in due course.</p>
<p>From table 1.2 of Appendix 9.5 of the Environmental Statement, the details of the receptor north of Winterbourne Stoke are unclear. It is queried whether this receptor is located at Cherry Lodge or Foredown House.</p>	<p>“Receptor to north of Winterbourne Stoke” in table 1.2 of Appendix 9.5, Noise and Vibration Summary of Effects Tables [APP-272], refers to Foredown House. This significant effect is described explicitly in ES Chapter 9, Noise and Vibration [APP-047], paragraph 9.9.33.</p>
<p>Public Protection Considerations – Lighting</p>	
<p>The Council considers the lighting proposal detailed within MW-G29 of table 3.2b of the OEMP to be satisfactory.</p>	<p>Noted, thank you for your comment.</p>
<p>Public Protection Considerations – Private water Supplies</p>	
<p>It is not clear whether human health / consumers of private water supplies have been considered as a receptor from table 10.8 in Chapter 10 of the Environmental Statement</p>	<p>This receptor has been considered through the assessment of groundwater and particularly source protection zones, as a supply of drinking water, as reported in Appendix 11.6 of the Environmental Statement [APP-284]. As set out in the leachate and groundwater results, reported in ES Chapter 10, Geology and Soils [APP-048], paragraph 10.6.65-10.6.71, the chemical results have also been screened against UK Drinking Water Standards and concludes no unacceptable risks to water quality are caused by the Scheme, including private water supplies.</p>
<p>The Council requires clarity on whether the contractor will be required to report any accidental spillages affecting the groundwater or private water supplies (PW-WAT1 of 3.2a of OEMP).</p> <p>In MW-GE02 of table 3.2b of the OEMP, it is requested that a requirement to “inform Wiltshire Council in case of groundwater contamination” is added.</p>	<p>In the case of the main works, item MW-WAT4 of the OEMP requires the main works contractor to include spill response procedures in its Emergency Preparedness and Response plan required by item MW-G20. This refers to the need for reporting to relevant parties and would include all water receptors such as groundwater and private water supplies. Highways England will discuss the issue of spill response and the preliminary works with Wiltshire Council and the results of this discussion will be captured in the Statement of Common Ground being prepared</p>

	<p>between the two parties, which will made available to the Examination in due course.</p>
<p>Public Protection Considerations – Land Contamination</p>	
<p>The Council and Environment Agency should be notified of discovery of unforeseen land contamination and to agree in writing any remediation / mitigation plan (PW-GEO2 of OEMP).</p>	<p>In the OEMP [APP-187], item PW-GEO2 states that in the event that contaminated land, including groundwater, is found at any time, which was not previously identified in the environmental statement, Requirement 7 of the DCO is applicable and preliminary works contractor (all) shall follow those provisions. Paragraph 7 of Schedule 2 of the draft Development Consent Order [APP-020], states that “in the event that contaminated land, including groundwater, is found...it must be reported as soon as reasonably practical to the planning authority (i.e. Wiltshire Council) and the Environment Agency and the undertaker must complete a risk assessment in consultation with the planning authority and the Environment Agency”.</p>
<p>Ecology and Landscape Considerations</p>	
<p>As a result of the detailed discussions held to date and following review of the DCO application, the Council is broadly content with the ecological and landscape aspects of the Scheme. The scope, methodology and assessment criteria for the Landscape and Visual Impact Assessment (LVIA) is accepted.</p>	<p>Highways England welcomes Wiltshire Councils comment in relation to the ecological and landscape aspects of the Scheme.</p>
<p>However, the Council has concerns surrounding the Preliminary Works and what they might include. It is imperative that sufficient good working practices and forward mitigation are in place for all preliminary works. The Outline Environmental Management Plan (OEMP) must be robust enough to enable the preliminary works, e.g. habitat works and site clearance, to be carried out sensitively. There are potential issues around contamination, utilities diversion and minor highways works that should be specifically covered to ensure the prevention of ecological impacts. The Council is concerned that all of the preliminary works included do have the potential to cause ecological impact, but they appear to be covered very broadly or not at all by the OEMP.</p>	<p>The OEMP [APP-187] is secured through paragraph 4 of Schedule 2 of the draft Development Consent Order [APP-020] and is the basis from which detailed, works-specific, CEMPs will be prepared by the relevant contractors. Highways England considers the OEMP provides sufficient detail at paragraphs 1.2.5 and 1.2.6 and Table 1.1 (with reference to specific numbered works in Schedule 1 of the DCO, works plans and engineering section drawings) as to what the preliminary works entail, and that the OEMP sets out the appropriate actions and commitments with respect to the preliminary works in Table 3.2a. Each of the Preliminary Works contractors will be required to develop a detailed CEMP that covers the scope of their works. For the habitats work and site clearance, this will include precautionary methods of works (PMoWs) to be adopted in order to avoid and mitigate for any negative impacts on ecological receptors during works undertaken. Specific method statements will be produced, where appropriate, to inform the specific proposed ecological mitigation works.</p>

<p>Furthermore, whilst on balance the LVIA judges there will be an overall enhancement for landscape and visual effects, further consideration is required to better understand the temporary adverse impacts (construction phase) and the residual effects upon visual amenity at either end of the tunnel, in particular the Till Viaduct and Countess flyover.</p>	<p>Highways England will continue to engage with Wiltshire Council, as required, to assist in their understanding and consideration of the temporary adverse impacts (construction phase) and the residual effects upon visual amenity at either end of the tunnel, which are already considered and reported in the Environmental Statement.</p>
<p>Flood and Drainage Considerations – General</p>	
<p>Whilst the various reports contain some cross referencing, it is the perception that these have been undertaken as standalone studies. There is little explanation as to how similar approaches / data sets are utilised across the studies or highlighting where there may be inconsistencies. Greater consideration is required of the combined effects and shortfalls in each stage of the design to ensure risks are highlighted and designed out. Each of the reports would benefit from a section outlining the overall Scheme and key constraints, or issues, with respect to other detailed studies being reported so that each specific study can be contextualised.</p>	<p>The methodologies used were in accordance with DMRB and EIA guidance, as outlined in Chapter 4 of the ES [APP-061] and with an in-combination assessment of impacts undertaken.</p>
<p>Furthermore, the drainage infiltration systems are to be designed for 100yrs + 30% climate change increase in rainfall. However, the pluvial modelling of general surface water runoff allows for some 40% increase in rainfall (as per Environment Agency guidance) because of climate change, whilst the groundwater study allows for increased recharge by 20%. Given the interdependency between the three constituents in terms of flood risk and design, the approaches are inconsistent and there is no mention in the reporting that one approach may under or overestimate inputs to one or more of the other studies. These inconsistencies are required to be addressed or as a minimum discussed further to provide evidence that under / over estimating in one study will not influence other parts of the study</p>	<p>The infiltration systems have been designed in consideration of, and to accommodate, all run-off from the highway. There is no flow into these basins from groundwater, the invert levels are placed as a minimum 1m above groundwater. The overland flows are channelled away from the basins so there are no flows from the land drainage catchments entering the systems.</p> <p>Highways England does not consider that the approaches are inconsistent. However, this matter has been discussed with Wiltshire Council and will be clarified through the updated FRA, which will be submitted to the Examination at Deadline 2.</p> <p>The different flooding mechanisms used different percentage increases in rainfall (or recharge where appropriate) to suit the different flooding processes. There is no guidance specifying the way that climate change should be considered in the groundwater flood risk assessment.</p> <p>Unlike for fluvial and surface water flood risk where a rainfall event can be specified, for groundwater modelling the proportion of any rainfall event that becomes recharge to the aquifer will vary with the antecedent conditions and the intensity of the rainfall event. An intense rainfall event</p>

	<p>may lead to significant runoff and little recharge, while a summer storm may not generate recharge if there is a significant soil moisture deficit. In winter rainfall will become recharge when the soil zone has become saturated.</p> <p>The fluvial and surface water flood modelling [APP-284] considered an increase in rainfall using the summer as a critical storm duration. The groundwater modelling [APP-282] has assumed that this increase in rainfall in winter may generate a 20% increase in recharge when considering winter groundwater flood risk. This was considered to be a reasonable estimate for groundwater flood risk considering the expected variability after any rainfall event.</p>
<p>The road drainage strategy discusses typical maintenance of SuDS and drainage features, however there is no discussion in the pluvial study report as to how the 539m culvert would be maintained</p>	<p>The drainage system installed as part of the Scheme will form part of the Highways England network and so will be maintained by Highways England. This will include any culverts that are installed as part of the drainage system. See below for consideration of the 539m culvert.</p>
<p>Flood and Drainage Considerations – Surface Water (Pluvial)</p>	
<p>The current proposed design may lead to increased runoff from some catchments e.g. from the Parsonage Down culvert, to receiving watercourses. Additional information is required to address how this increased runoff will be managed / mitigated.</p>	<p>Highways England acknowledges Wiltshire Council’s concerns and, as such, updated and additional hydraulic modelling information is being produced to provide Wiltshire Council with more detail regarding the modelling undertaken in response to their queries. This information will be submitted with the updated FRA that is to be submitted at Deadline 2. The updated FRA will address the management of any increased run-off.</p>
<p>The modelling approach was found to be generally sound, however there are some items / queries that require further information or additional model runs.</p>	<p>Updated and additional hydraulic modelling information is being produced to provide Wiltshire Council with more detail regarding the modelling undertaken in response to their queries. This information will be submitted with the updated FRA that is to be submitted at Deadline 2.</p>
<p>The model includes a 539m long, 5m deep culvert as part of the design which is contrary to Council policy on culverting. There are several perceived issues with the design of the culvert. However, there is no supporting evidence as to how this design is the best / most appropriate option or why other options are not viable.</p>	<p>Wiltshire Council’s comments have been addressed and the 539m long culvert no longer forms part of the proposed scheme. The refined proposal includes a culvert to divert the flood flows beneath the proposed A303 from north to south. From here the runoff would be conveyed in a ditch before out-falling into a culvert which would convey the water from the west of the B3083 to the east into the dry valley. The refined proposal would maintain the existing path of the overland flood flows. This refined road drainage proposal has been agreed with Wiltshire Council following their comments. The proposal represents a refinement of the drainage strategy but remains</p>

	<p>consistent with the description of the drainage proposals presented in Chapter 2 of the ES [APP-040]. The refined Road Drainage Strategy will be submitted to the Examination at Deadline 2. Agreement on this issue has been captured in the Statement of Common Ground being prepared between the two parties, which will be made available to the Examination in due course.</p>
<p>The current model results for the Scheme show that the modelled water levels are still rising at the end of the model run. The model results therefore do not capture flood risk accurately.</p>	<p>Highways England considers that the modelling undertaken to inform the FRA [APP-283] captures flood risk accurately. Highways England have discussed this detailed point with Wiltshire Council and, as such, updated and additional hydraulic modelling is being produced to provide Wiltshire Council with more detail regarding the modelling undertaken in response to this query. This information will be submitted with the updated FRA that is to be submitted to the Examination at Deadline 2.</p>
<p>There is an increase in flood risk due to the proposed Scheme.</p>	<p>Overall, the FRA [APP-283] concludes that there is low or negligible flood risk arising to or from the Scheme for all forms of flooding. There are localised areas of increased flood depths arising from the scheme design (e.g. east of Parsonage Down), however, these areas will all be within the control of Highways England or within the Order Limits of the Scheme.</p>
<p>In order to generate confidence in the approach and outputs, the following points should be addressed: Sensibility / verification check of Depth-Duration-Frequency (DDF) modelling from Flood Estimation Handbook (FEH) with local rainfall data 15-minute data should be available which could affect design inputs to the model. Further discussion and sensitivity testing of the initial soil moisture content (Cini) value to be utilised in the project is required as the value is based on baseline catchment descriptors only.</p>	<p>Updated and additional hydraulic modelling information is being produced to provide Wiltshire Council with more detail regarding the modelling undertaken in response to these queries. This information will be submitted with the updated FRA that is to be submitted to the Examination at Deadline 2.</p>
<p>Furthermore, there are several queries and items that are required to be answered or addressed from the hydraulics study: The Triangular Irregular Networks (TINS) utilised to define the option topography should be better integrated with the underlying Light Detection and Ranging (LIDAR). There appears to be a 1m difference / step at the interface of the baseline Digital Terrain Model (DTM) and the proposed scheme. There is conflicting information as to the design of the proposed culvert dimension which requires clarification / changes. There is no justification</p>	<p>In response to points a), c) and f), updated and additional hydraulic modelling information is being produced to provide Wiltshire Council with more detail regarding the modelling undertaken in response to these queries. This information will be submitted with the updated FRA that is to be submitted to the Examination at Deadline 2.</p> <p>In response to points b) and d), Highways England has discussed the design of culverts with Wiltshire Council and has consequentially refined its drainage proposals. This refined road drainage proposal has been agreed</p>

<p>as to the dimension of the pipe required and no sensitivity testing of results of different sizes of culvert. The model should be run for a longer simulation time as water levels are still rising at the current end-time of 10 hours. It will be important to test other storm durations, culvert sizes, (and model simulation length) to optimise the scheme. The study does not consider the risk of blockage of the proposed culvert. Culverting of watercourse is often opposed by councils and the Environment Agency as it is against many of the legal requirements set out in the Water Framework Directive (2003) that the quality of the watercourse should not be reduced. At 539m long and buried to up to 5m deep, the maintenance of such an asset would be extremely difficult and expensive should a repair be required. The proposals need to confirm who will own the culvert, who will be responsible for maintenance, and what the maintenance regime will be. The proposals need to evaluate the resulting depth of flooding and flood hazard adjacent / across / downstream of the B3083 post scheme.</p>	<p>with Wiltshire Council following their comments. The proposal represents a refinement of the drainage strategy but remains consistent with the description of the drainage proposals presented in Chapter 2 of the ES [APP-040]. The refined Road Drainage Strategy will be submitted to the Examination at Deadline 2. Agreement on this issue has been captured in the Statement of Common Ground being prepared between the two parties, which will be made available to the Examination in due course. In response to point e), Highways England will be responsible for drainage maintenance in-line with the principles of maintenance set out in the Road Drainage Strategy [APP-281].</p>
<p>Flood and Drainage Considerations – Groundwater</p>	
<p>Overall the groundwater study approach is sound and appropriate methods have been adopted where possible. However, a number of inconsistencies and omissions have been identified which require further detail / modelling to be reported / undertaken.</p>	<p>Highways England acknowledges Wiltshire Council's recognition that the groundwater study approach and methods are sound and appropriate. Highways England is engaging with Wiltshire Council to understand and address the referred to inconsistencies and omissions. Ongoing discussion and agreement on this matter will be captured through the Statement of Common Ground being prepared between the two parties, which will be made available to the Examination in due course.</p>
<p>The groundwater modelling study has shown that the scheme is unlikely to have any significant impacts on groundwater. However, there is no discussion of the combined effect of several minor or insignificant changes on the system.</p>	<p>The water assessment, as set out in ES Appendix 11.6, Non-Significant Effects [APP-284], identifies non-significant effects on the water environment, including groundwater. The potential for in-combination effects is considered through the Assessment of cumulative effects, as reported in ES Chapter 15 [APP-053]. The assessment of cumulative effects does not identify any significant effects on groundwater as a result of in-combination non-significant effects.</p>
<p>There is little in the way of cross referencing to the surface water (pluvial) study or road drainage strategy within the documentation, the findings of the groundwater study will have a direct impact on the other two studies.</p>	<p>Groundwater modelling was undertaken in close consultation with the road drainage and pluvial modelling and has informed both the pluvial study and the Road Drainage Strategy. The general approach to the road drainage and water environment assessment, which includes cross-referencing</p>

	<p>between the groundwater and pluvial studies, is set out in ES Chapter 11 [APP-049]. The Road Drainage Strategy [APP-281] makes multiple references to groundwater monitoring and modelling in the context of road drainage, including, but not limited to, in Section 2.4 Hydrology and Geology.</p>
<p>In order to focus the approach and outputs, the following points should be addressed: The model would preferably be run for the full 1965-2016 run time for each of the revised baseline runs (the baseline run with the revised calibration, the wet climate change run and the dry climate change run) and thorough comparisons made with the original Wessex basin model output and with observation / gauge data. The short period runs would be checked against these and output from the full runs used as starting heads for the short runs. Provide clarification of how the climate change approach is consistent with that used in other flood risk assessments (and ensure they are consistent) Use monitoring data comparisons to inform caveats to be applied to the use of absolute levels for flood levels or in scheme design. The model is likely to be more reliable to predicting changes in heads (and flows) rather than absolute levels. Modelling absolute levels in extreme events would particularly hold uncertainty. The predicted position of the water table in terms of depth below ground should be used with a degree of caution.</p>	<p>This has been addressed in a supplementary report: 'Supplementary Groundwater model runs to Annex 1 Numerical Model Report' (HE551506-AMW-EWE-SW-GN-000-ZZ-RP-WR-0103), where thorough comparisons were made with the original Wessex Basin model, short and long duration models, and modified aquifer properties based on the findings of the Report 'Implications of 2018 Ground Investigations to the Groundwater Risk Assessment' (HE551506-AMW-EWE-SW-GN-000-ZZ-RP-WR-0102). The report confirms the GRA and the conclusions of the ES. A copy of this report was submitted to the Examination on 5 April 2019.</p> <p>The different flooding mechanisms used different percentage increases in rainfall (or recharge where appropriate) to suit the different flooding processes. There is no guidance specifying the way that climate change should be considered in the groundwater flood risk assessment. Unlike for fluvial and surface water flood risk where a rainfall event can be specified, for groundwater modelling the proportion of any rainfall event that becomes recharge to the aquifer will vary with the antecedent conditions and the intensity of the rainfall event. An intense rainfall event may lead to significant runoff and little recharge, while a summer storm may not generate recharge if there is a significant soil moisture deficit. In winter rainfall will become recharge when the soil zone has become saturated. The fluvial and surface water flood modelling [APP-284] considered an increase in rainfall using the summer as a critical storm duration. The groundwater modelling [APP-282] has assumed that this increase in rainfall in winter may generate a 20% increase in recharge when considering winter groundwater flood risk. This was considered to be a reasonable estimate for groundwater flood risk considering the expected variability after any rainfall event.</p> <p>Highways Drainage and Flood Risk are held to different national guidance standards for the representation of climate change. As such, both disciplines apply national best practice. Agreement on this matter will be</p>

	<p>captured in the Statement of Common Ground being prepared between Wiltshire Council and Highways England, which will be submitted during the course of the Examination.</p> <p>The groundwater assessment [APP-282] has referred to the changes compared to the baseline and the natural variability, so considers the relative difference from the baseline rather than absolute levels. The model calibration is conservative in that it slightly overestimates peak groundwater levels, so the relative difference assessment is conservative for flood risk. That is, the model considers the depth to groundwater to be shallower than observed and also assumes a risk of groundwater flooding if groundwater is predicted to be within 2m of ground surface, rather than only above surface.</p>
<p>Flood and Drainage Considerations – Road Drainage Strategy</p>	
<p>The strategy is still at a high-level concept stage, further explanation of the design in several areas is required. However, the study reach has been broken down into three main constituents (west / tunnel / east) which helps to differentiate the different concepts being proposed. It is also cross-referenced to the other two studies.</p>	<p>The Road Drainage Strategy [APP-281] is intended as a high-level concept document. Following submission of these comments further information has been provided to Wiltshire Council where requested. It has been agreed between Wiltshire Council and Highways England that the level of detail is appropriate. Agreement on this matter will be captured in the Statement of Common Ground to be submitted to the Examination in due course.</p>
<p>The predominant drainage discharge strategy for the tunnel is by edge collection, carrier drain leading to a sump, then to be pumped to the surface and outfall to the surface water drainage network. The tunnel drainage system is independent from the other drainage networks (on the highway approaches to the tunnel).</p>	<p>Noted. This comment describes the Tunnel Drainage Strategy contained within The Road Drainage Strategy [APP-281], Section 4.</p>
<p>Drainage treatment areas are proposed to attenuate the flow and act as pollution control. The report provides little information on their design or maintenance regime in order to be able to comment on their suitability or effectiveness. Several of these are located at distance from the carriageway. However, there are no details of how the water will reach these isolated areas.</p>	<p>The infiltration basins have been located to minimise visual impact and become integrated as part of the landscape. Conveyance of water to these infiltration basins will be via carrier pipes and narrow filter drains, as described in Chapter 3 of the Road Drainage Strategy [APP-281] and shown indicatively on Figure 3.1, <i>Drainage Conceptual Details</i>. The infiltration basins will be owned and maintained by Highways England. Information regarding the maintenance regime for the SuDS features is provided in section 8 of the Road Drainage Strategy [APP-281].</p> <p>Highways England continues to engage with Wiltshire Council on the Road</p>

	<p>Drainage Strategy, including preliminary discussions of detailed matters such as the carrier piping routes for water reaching the drainage treatment areas.</p>
<p>A number of crate storage systems are proposed as part of the design. However, such SuDS features are actively discouraged by Wiltshire Council due to maintenance liabilities and difficulties in accessing inside them. Alternatives for these need to be considered and discussed with Wiltshire Council.</p>	<p>The section of the A303 in which the crate system concept is currently proposed is within Highways England's ownership and maintenance responsibilities, not Wiltshire Council's.</p>
<p>The following points should be addressed to give confidence in the approach and outputs: The infiltration systems are to be designed for 100yrs + 30% climate change. It is not explained whether the surface water runoff can be suitably conveyed to the discharge points i.e. to what return period the sizing of carrier pipes will be made. There is no confirmation to flood risk posed to the proposed drainage treatment areas (DTAs). This should be checked for both impact on the scheme and impact on surrounding land etc. It is likely that detailed design will impact on existing overland flow routes. The ponds are intended to use a proprietary treatment system for treatment of water quality; it is unclear what systems might be employed here, where the full discharge is to ground. The details on how particulates (solids), hydrocarbons, and other chemical contaminants will be treated are not given. The proprietary treatment should attenuate all typical contaminants, giving sufficient residence time to achieve this. It is unclear what happens when the pond base blinds with sediment and infiltration is restricted, or where the design event is exceeded The capacity of the network storage for pollution spills is not described. It is recommended that the DTAs are designed with a receiving forebay to be capable of holding such contaminated discharges before entering the infiltration zone. The use of a buried crate system for infiltration is not favoured by Wiltshire Council because of the maintenance liabilities and difficulties in accessing inside them. Highways England should provide details of how such systems will be maintained and make due consideration of risk to drainage whence they are not performing as per the design. No resilience measures are described for the pumped system in the tunnel. Consideration should be made to the event of power or mechanical</p>	<p>The Road Drainage Strategy [APP-281] gives an indication of the drainage proposals for the Scheme at this stage of the design and includes reference to drainage design (such as carrier pipes), infiltration basins and drainage treatment to deal with contaminants under normal operations and as a result of accidents or spillages. It has been agreed between Wiltshire Council and Highways England that the level of detail is appropriate. Agreement on this matter will be captured in the Statement of Common Ground to be submitted to the Examination in due course.</p> <p>a) The runoff will be suitably conveyed to the discharge points. The highway drainage systems will be designed to ensure no carriageway flooding in a 1 in 5 year + CC event in line with DMRB requirements.</p> <p>b) Evidence showing the overland flow routes around the proposed DTA's will be provided to Wiltshire Council in drawing format, which reflect existing flow paths as much as possible (and thus impact on surrounding land). These demonstrate that the overland flood flows do not interact with the DTAs and that there are no impacts on the highway drainage system.</p> <p>c) The infiltration basins will be lined with material designed to retain the majority of contaminants, as set out at para 3.2.3 of the Road Drainage Strategy [APP-281]. Any that do pass through this layer will be attenuated in the unsaturated layer, which is the layer of ground between the bottom of the basin and the top of the groundwater table. This is designed to be at least 1m. The choice of material to meet the requirements will be determined at detailed design. The Applicant notes in that regard that paragraph 10 of Schedule 2 to the draft DCO [APP-020] requires the detail of the drainage system to be approved by the Secretary of State, following consultation with Wiltshire Council.</p>

failure, as may be more so expected during extreme rainfall.
It is not clear why the DTAs in the western approaches are remote from the road.

d) To prevent blinding of the base regular maintenance of the systems will be undertaken by Highways England pursuant to the provisions of part 8 of the Drainage Strategy. Figure 8.1 in the Road Drainage Strategy [APP-281] indicates the maintenance requirements for sustainable drainage systems. When the design event is exceeded the basins will overflow in a controlled manner with flows diverted to the watercourse or land drainage system to ensure no detrimental effect to adjacent lands. The exceedance routes from the basins have been provided to Wiltshire Council.

e) The road drainage for the Scheme will be designed, constructed and maintained to DMRB standards including in relation to storage for pollution spills. Details of the spillage containment will be provided within the detailed design of the drainage systems which Wiltshire Council will be consulted upon pursuant to paragraph 10 of Schedule 2 to the draft DCO [APP-020].

f) The DTAs will be owned and maintained by Highways England. The Road Drainage Strategy [APP-281] provides details on the arrangements which include an impermeable area to trap runoff during rainfall events. This performs a similar role to a receiving forebay but is considered to be a more appropriate approach for this Scheme.

g) The section of the A303 in which the crate system concept is currently proposed is within Highways England's ownership and maintenance responsibilities, not Wiltshire Council's and so will be maintained by Highways England further to the principles set out in the Road Drainage Strategy [APP-281].

h) The Applicant continues to discuss this issue with Wiltshire Council, but can confirm that the details of such measures would be provided as part of the detailed drainage design submitted for approval under paragraph 10 of Schedule 2 to the draft DCO [APP-020].

i) The design and positioning of drainage treatment areas in the west of the Scheme is proposed at optimal outfall locations following consultation with relevant landowners. They have been designed to be as close to the new

	<p>road as possible and the final sizing is subject to detailed design. As described in paragraphs 3.2.2 to 3.2.5 and Figure 3.1 of the Road Drainage Strategy [APP-281], these DTAs are required to attenuate the highway runoff, to reduce the risk of flooding to adjacent communities, and to treat the runoff. The existing road drainage does not meet current design standards and these basins, by reducing both pollution and flood risk, would enhance the drainage by bringing it up to current design standards.</p>
<p>Flood and Drainage Considerations – Preliminary and Temporary Works</p>	
<p>The preliminary and temporary works, as detailed within the Outline Environmental Management Plan (OEMP), will take 6 years to complete (2020-2026), therefore the impact on flood risk could be significant. However, the OEMP is light on detail and only high-level at this stage. Once the DCO is approved, Construction Environmental Management Plans (CEMPs) will be prepared by the preliminary works contractors and the main contractor. It is essential that the Council are consulted, and given sufficient time, for the approval of these CEMPs, and as part of the discharge of requirements, to ensure that flood risk is managed during the construction period.</p>	<p>The Applicant notes that the Flood Risk Assessment [APP-283] for the Scheme concludes that the flood risk arising from the construction period is Low in respect of fluvial and surface water flooding and Negligible for groundwater or sewer flooding, as set out in Chapter 10.</p> <p>As set out in the Outline Environmental Management Plan (OEMP) [APP-187], Wiltshire Council will be consulted with during the development of the Construction Environmental Management Plans (MW-G5). Flood risk during construction will be managed through the implementation of measures contained within the OEMP, which will include, but not be limited to, the preparation and implementation of a Flood Risk Management Plan (MW-WAT12) and other general flood risk provisions (MW-WAT13). The OEMP is secured through paragraph 4 of Schedule 2 of the draft Development Consent Order [APP-187].</p>
<p>Public Rights of Way Considerations – General</p>	
<p>The legislative process by which the creation, diversion and extinguishment (stopping-up) of the affected public rights of way needs to be agreed with the Council as the Surveying Authority; with particular regard to whether the confirmation of the legal orders enables of itself the Council to amend the Definitive Map and Statement, or whether further orders will need to be made by the Council to enable those amendments.</p>	<p>The Scheme’s proposals for public rights of way are shown on the Rights of Way and Access Plans [APP-009] and described in Schedule 3 to the draft DCO. Article 10 of the draft DCO [APP-020] would provide the legislative basis for the creation, diversion and extinguishment of highways, if the DCO is made by the Secretary of State in the form applied for by Highways England. The exercise by Highways England of the power in Article 10 would give effect to the creation, diversion and extinguishment of streets and private means of access, as shown on the Rights of Way and Access plans and as provided for in the DCO. There would be no need for Wiltshire Council to make any further order(s).</p>
<p>Furthermore, where the diversion and creation of new sections of public rights of way will lead to the new routes becoming maintainable at public expense by the Council as Highway Authority, design and construction</p>	<p>The draft DCO [APP-020] includes provision (at article 9) for new, altered or diverted highways to be completed to the reasonable satisfaction of the local highway authority, in this case Wiltshire Council. The scope of article</p>

<p>details and specifications must be agreed by the authority prior to the commencement of works, and to be certified by the authority on completion as having been provided to the required standard before the authority accepts responsibility. Any requirements for the payment to the Council of commuted sums to cover / assist with the costs of maintenance of the new routes must also be agreed before the Council accepts responsibility.</p>	<p>9 encompasses matters of design, construction details and specifications relating to new or diverted public rights of way.</p> <p>Discussions are underway between Highways England and Wiltshire Council on matters relating to highways (including potential commuted sum arrangements) which would be maintained by Wiltshire Council. These matters will be subject to agreement.</p>
<p>Where temporary diversions or closures of public rights of way are necessary during the construction phase, the construction details of alternative routes to be provided must be agreed in advance with the Council as Highway Authority.</p>	<p>Details of temporary diversions and closures will be dealt with through the CEMP, which will be secured through the OEMP [APP-187], which in turn is secured through paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020].</p>
<p>Another unresolved matter is the severed link between BOAT AMES11 and AMES12 for motorised users. This creates a breach of Wiltshire Council's statutory duty under s.130 Highways Act 1980 to prevent, as far as possible, the stopping-up of highway rights, with the lack of any mitigation measures. Wiltshire Council has agreed not to oppose an order for the prohibition of driving of motor vehicles on the byways and considers that the need for such an order has been brought about by Highways England's decision not to provide an alternative link between the two byways. As such, the Council considers this to be Associated Development and believes that the prohibition of driving order should be included within the DCO.</p>	<p>Highways England acknowledges the consideration by Wiltshire Council of its duties under section 130 Highways Act 1980.</p> <p>Byway 11 will terminate where it currently joins the existing A303, which will be converted into a restricted byway. This will prevent vehicles from using the route of the old A303 between Byways 11 and 12 in close proximity to Stonehenge to the detriment of the monument's setting. No link for mechanically-propelled vehicles (MPV) between Byways 11 and 12 has been proposed further south of the A303 as it would have an adverse impact on the adjacent Normanton Down barrow group and on the tranquillity of the WHS at this location. MPVs seeking access between Byways 11 and 12 will use the public highway network. Non-motorised users will be able to link between Byways 11 and 12 via the new restricted byway being created along the route of the old A303 through the WHS. Currently, MPV users of Byways 11 and 12 are not permitted to make right turns onto the A303 from those byways or onto those byways from the A303.</p> <p>Wiltshire Council would remain the highway and traffic authority for Byways 11 and 12 and the Scheme does not impede Wiltshire Council from the lawful exercise of its functions to prohibit driving, should it choose to do so.</p>
<p>New Restricted Byway and Byway Open to All Traffic between Steeple Langford BOAT3 and Green Bridge No. 1</p>	
<p>Further detail is required of the surface to be provided, width, signage and waymarking, structures to provide access for non-motorised users and private means of access whilst excluding motorised users, boundary fencing / hedging, and fencing of Green Bridge against drops.</p>	<p>The new restricted byway is shown on sheets 1, 2 and 3 of the Rights of Way and Access Plans [APP-009], reference B, on the northern side of the existing A303 which would be carried over the new A303 by Green Bridge No. 1 until it connects with the existing A303 (to be de-trunked). A new restricted byway is shown on sheets 1 and 2 of the Rights of Way and</p>

	<p>Access Plans, reference A, on the southern side of the existing A303, until it reaches the existing bridleway BSJA3 (see sheet 2). From this point, in an easterly direction, the restricted byway becomes a new byway open to all traffic (reference D) which continues towards Winterbourne Stoke along the line of the existing A303 (to be stopped up).</p> <p>In accordance with article 9 of the draft DCO [APP-020] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. It is noted that such discussions will need to include matters such as proposals for surfacing, width, signage and boundary treatments. The outcome of those discussions will be subject to agreement between the two parties and will be submitted to the Examination in due course.</p>
<p>Stopping-up of BOAT Berwick St. James 3A and Creation of BOAT over Existing Bridleway Berwick St. James 3A</p>	
<p>Detailed proposals for physical closure of BOAT3A and proposals for signage, surface improvements and boundary fencing / hedging alongside upgraded BOAT3 are required.</p>	<p>As shown on sheet 2 of the Rights of Way and Access Plans [APP-009], bridleway BSJA3 is proposed to be replaced with a byway open to all traffic (reference C).</p> <p>In accordance with article 9 of the draft DCO [APP-020] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. It is noted that such discussions will need to include matters such as proposals for surfacing, width, signage and boundary treatments. The outcome of those discussions will be subject to agreement between the two parties and will be submitted to the Examination in due course.</p> <p>Highways England also proposes to stop up a short length of bridleway BSJA3A, at its northernmost end, where it would be subsumed within the improved A303 (see sheet 2 of the Rights of Way and Access Plans [APP-009]).</p>
<p>Realignment of Northern End of Winterbourne Stoke BOAT3 onto B3093</p>	

<p>Detailed proposals for the new junction, signage, surfacing, and boundary fencing / hedging are required.</p>	<p>Highways England proposes to re-align the northern section of byway open to all traffic WST03 to connect it to the re-aligned B3083 (see sheet 3 of the Rights of Way and Access Plans [APP-009] reference EA) and stop up the section that would become redundant.</p> <p>In accordance with article 9 of the draft DCO [APP-020] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. It is noted that such discussions will need to include matters such as proposals for surfacing, width, signage and boundary treatments. The outcome of those discussions will be subject to agreement between the two parties and will be submitted to the Examination in due course.</p>
<p>Diversion of Winterbourne Stoke BOAT6 over Green Bridge No. 2</p>	
<p>Detailed proposals for surfacing, width, signage, boundary fencing / hedging, and fencing of Green Bridge against drops required.</p>	<p>Highways England proposes to re-align byway open to all traffic WST06B so that it is carried over the new A303 by Green Bridge No. 2 as shown on sheet 4 of the Rights of Way and Access Plans [APP-009].</p> <p>In accordance with article 9 of the draft DCO [APP-020] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. It is noted that such discussions will need to include matters such as proposals for surfacing, width, signage and boundary treatments. The outcome of those discussions will be subject to agreement between the two parties and will be submitted to the Examination in due course.</p>
<p>Bridleway Link Between Winterbourne Stoke and New Longbarrow Roundabout</p>	
<p>It is unclear from the plans, which side of the road this is intended to be situated (north or south). Detailed proposals for surfacing, width, signage, and boundary fencing / hedging are also required.</p>	<p>The new bridleway link between Winterbourne Stoke and the New Longbarrow Junction is shown on sheet 4 of the Rights of Way and Access Plans [APP-009], reference Z, where it is shown running on the northern side, and outside the highway boundary of the existing A303 (to be de-trunked), until it reaches the highway boundary of the new side road,</p>

	<p>reference G. This (reference G) comprises the new road connecting the existing A303 (to be de-trunked) with the new Longbarrow Junction Southern Roundabout (shown on sheet 5 of the Rights of Way and Access Plans), at which point it would be subsumed within the highway boundary of the new link road, reference G.</p> <p>In accordance with article 9 of the draft DCO [APP-020] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. It is noted that such discussions will need to include matters such as proposals for surfacing, width, signage and boundary treatments. The outcome of those discussions will be subject to agreement between the two parties and will be submitted to the Examination in due course.</p>
<p>New Restricted Byway North from Existing Longbarrow Roundabout / Old A303 to Stonehenge Visitor Centre, Old A344 and A360</p>	
<p>Detailed proposals for surfacing, width, signage, and boundary fencing / hedging required. Finalisation and agreement of the route at the Visitor Centre car park is also required.</p>	<p>Highways England proposes to stop up the existing Longbarrow Roundabout and the parts of the existing A303 and A360 that would become redundant with the Scheme in place, in particular the new A303 and new Longbarrow Junction and associated link roads, as shown on sheets 5, 14 and 15. To the north of the existing Longbarrow Roundabout, the redundant existing A360 (and part of the existing A303 to be stopped up) would become a new restricted byway (reference IB, as shown on Sheet 5 of the Rights of Way and Access Plans) which continues to the north to Ariman's Corner (references U and UA).</p> <p>The new restricted byway would be within the World Heritage Site. The Outline Environmental Management Plan [APP-187] reference D-CH14, requires Highways England to develop the fencing and surfacing within the World Heritage Site in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council. Compliance with the Outline Environmental Management Plan is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020].</p> <p>In accordance with article 9 of the draft DCO [APP-020] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's</p>

	<p>reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. It is noted that such discussions will need to include matters such as proposals for surfacing, width, signage and boundary treatments. The route at the Visitor Centre car park is subject to ongoing discussions with English Heritage and Wiltshire Council and will be subject to agreement between the parties and submitted to the Examination in due course.</p>
<p>New Restricted Byway South from Longbarrow Roundabout to Berwick St. James Restricted Byway 9 then New Bridleway Link to Woodford BOAT16 North of Druids Lodge</p>	
<p>Detailed proposals for surfacing, width, signage, and boundary fencing / hedging required.</p>	<p>The new restricted byway is shown on sheets 5 and 15 of the Rights of Way and Access Plans [APP-009], reference IA. Broadly it would run from the existing A303 (to be stopped up) in a southerly direction where it would then run along the line of the existing A360, on its eastern side. From its junction with byway BSJA9 (sheet 15) it would continue as a new bridleway, reference V.</p> <p>The new restricted byway and new bridleway would be within the World Heritage Site. The Outline Environmental Management Plan [APP-187] reference D-CH14, requires Highways England to develop the fencing and surfacing within the World Heritage Site in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council. Compliance with the Outline Environmental Management Plan is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020].</p> <p>In accordance with article 9 of the draft DCO [APP-020] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. The outcome of those discussions will be subject to agreement between the two parties and will be submitted to the Examination in due course.</p>
<p>Restricted Byway Link over Green Bridge No. 3</p>	
<p>Detailed proposals for surfacing, width, signage, boundary fencing / hedging, and fencing against drop required.</p>	<p>The Scheme does not feature a restricted byway link over Green Bridge No. 3.</p>

	<p>All the new public rights of way (PRoW) proposed along the length of the Scheme would be constructed in a way that will make them fit for all the uses permitted by their designated status. Exact cross-sectional details and construction materials would be determined as part of the Scheme's detailed design process and would be sensitive to the landscapes through which the rights of way would pass.</p> <p>The detail of the fencing and gating strategy for the PRoWs will follow at the detailed design stage if development consent for the Scheme is granted. At this stage it is envisaged that fences along public rights of way would be provided to prevent access onto private land, grazed grassland or the highway.</p>
<p>New Restricted Byway Replacing Existing Surface Route of A303 Between Longbarrow Roundabout and Stonehenge Road</p>	
<p>Details of overall width and surfaced width, surfacing materials, verge treatment, signage, and boundary fencing / hedging require finalisation.</p>	<p>The new restricted byway is shown on sheets 5, 6, 7 and 8 (references I, IB and J) and would be constructed along the line of the existing A303 which is proposed to be stopped up.</p> <p>The new restricted byway would be within the World Heritage Site. The Outline Environmental Management Plan [APP-187] reference D-CH14, requires Highways England to develop the fencing and surfacing within the World Heritage Site in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council. The redundant parts of the road surface of the existing A303 and A360 within the WHS would be removed in accordance with references D-CH2 and D-CH3 of the OEMP [APP-187]. Compliance with the Outline Environmental Management Plan is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020]. The new restricted byway within the WHS would provide a durable surface for non-motorised users including those needing mobility aids, and those vehicles permitted to use the route such as agricultural and maintenance vehicles. Details, including width and surface treatment, are under discussion.</p> <p>The surplus areas of redundant road surface would be replaced by chalk grassland and existing roadside furniture and infrastructure (signage, lighting columns etc.) would be removed (this approach is described in section 2.3.56 (d) of the Environmental Statement (ES) [APP-040]).</p>

	<p>In accordance with article 9 of the draft DCO [APP-020] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. The outcome of those discussions will be subject to agreement between the two parties and will be submitted to the Examination in due course.</p>
<p>Crossing of Old A303 New Restricted Byway with Amesbury BOAT12</p>	
<p>Detailed proposals for surfacing, width, signage, structures to control motorised and non- motorised users, and private means of access required.</p>	<p>The crossing of the new restricted byway (reference J) with byway open to all traffic AMES 12 is shown on sheet 6 of the Rights of Way and Access Plans [APP-009].</p> <p>The new restricted byway would be within the World Heritage Site. The Outline Environmental Management Plan [APP-187] reference D-CH14, requires Highways England to develop the fencing and surfacing within the World Heritage Site in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council. Compliance with the Outline Environmental Management Plan is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020].</p> <p>In accordance with article 9 of the draft DCO [APP-020] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. The outcome of those discussions will be subject to agreement between the two parties and will be submitted to the Examination in due course.</p>
<p>Junction of Old A303 New Restricted Byway Junction with Amesbury BOAT11</p>	
<p>Detailed proposals for surfacing, turning area, signage, structures to control motorised and non-motorised users, and management of motorised user traffic on BOAT11 at junction with new Restricted Byway required.</p> <p>The Council considers the effects of the severance of the link between Amesbury BOATs 11 and 12 for motorised vehicles to require the making</p>	<p>The junction of the new restricted byway (reference J) with byway open to all traffic AMES 11 is shown on sheet 6 of the Rights of Way and Access Plans [APP-009].</p> <p>The new restricted byway would be within the World Heritage Site. The Outline Environmental Management Plan [APP-187] reference D-CH14,</p>

of a traffic regulation order to prohibit driving of motorised vehicles. The Council considers this to be Associated Development, and therefore requires the prohibition of driving order to be included within the DCO.

requires Highways England to develop the fencing and surfacing within the World Heritage Site in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council. Compliance with the Outline Environmental Management Plan is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020].

In accordance with article 9 of the draft DCO [APP-020] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. The outcome of those discussions will be subject to agreement between the two parties and will be submitted to the Examination in due course.

In respect of the asserted severance of the link between Byways 11 and 12, Byway 11 will terminate where it currently joins the existing A303, which will be converted into a restricted byway. This will prevent vehicles from using the route of the old A303 between Byways 11 and 12 in close proximity to Stonehenge to the detriment of the monument's setting. No link for mechanically-propelled vehicles (MPV) between Byways 11 and 12 has been proposed further south of the A303 as it would have an adverse impact on the adjacent Normanton Down barrow group and on the tranquillity of the WHS at this location. MPVs seeking access between Byways 11 and 12 will use the public highway network. Non-motorised users will be able to link between Byways 11 and 12 via the new restricted byway being created along the route of the old A303 through the WHS. Currently, MPV users of Byways 11 and 12 are not permitted to make right turns onto the A303 from those byways or onto those byways from the A303.

Wiltshire Council would remain the highway and traffic authority for Byways 11 and 12 and the Scheme does not impede Wiltshire Council from the lawful exercise of its functions to prohibit driving, should it choose to do so.

Connection of Amesbury Footpath 13 into Stonehenge Road

<p>Due to proposals currently being considered / developed by Highways England as to whether Stonehenge Road becomes a Restricted Byway at this location, further information is required relating to any proposed changes at this junction.</p>	<p>The Scheme would result in part in of the existing Stonehenge Road becoming a new restricted byway (reference J). This is shown on sheet 8 of the Rights of Way and Access Plans [APP-009].</p> <p>The new restricted byway would be within the World Heritage Site. The Outline Environmental Management Plan [APP-187] reference D-CH14, requires Highways England to develop the fencing and surfacing within the World Heritage Site in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council. Compliance with the Outline Environmental Management Plan is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020].</p> <p>In accordance with article 9 of the draft DCO [APP-020] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. The outcome of those discussions will be subject to agreement between the two parties and will be submitted to the Examination in due course.</p>
<p>Stopping-up of Amesbury BOAT1 and Connection to A303</p>	
<p>Detail of physical works to effect stopping-up required.</p>	<p>The stopping up of byway AMES1 and its replacement with a new footpath (reference P) is shown on sheet 11 of the Rights of Way and Access Plans [APP-009].</p> <p>In accordance with article 9 of the draft DCO [APP-020] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. It is noted that such discussions will need to include matters relating to the detail of any physical work required to affect the stopping-up. The outcome of those discussions will be subject to agreement between the two parties and will be submitted to the Examination in due course.</p>
<p>Stopping-up of Amesbury BOAT2 and Connection to A303</p>	

<p>Detail of physical works to effect stopping-up required.</p>	<p>The stopping up of Byway AMES2 is shown on sheet 11 of the Rights of Way and Access Plans [APP-009]. The detail of the physical works to affect the stopping-up would be determined as part of the detailed design for the Scheme. Highways England notes that from the exercise of the power to stop up in accordance with article 10 of the draft DCO [APP-020] AMES2 would cease to be a highway and so would no longer form part of Wiltshire Council's adopted highway network.</p>
---	---

20 Environment Agency (RR-2060)

20.1 Key issues

Table 20-1: Environment Agency

Matter Raised	Highways England's Response
<p>The risks to groundwater levels and flows posed by the placement of the tunnel structure have been investigated. However, we are awaiting outcomes from further work/clarification (pump testing and updated risk assessments) as part of a peer review of the groundwater modelling work. It is essential for us to have agreed this evidence prior to the formal Development Consent Order (DCO) examination period, as this modelling underpins the groundwater position put forward in DCO. We currently do not have a finalised timescale for receipt of this outstanding information (provisionally indicate to be in January).</p>	<p>The Applicant submitted pump testing and updated risk assessment results to the Environment Agency on 21 January 2019.</p> <p>The results of additional model runs and the analysis of monitoring data collected in the past year were submitted to the Environment Agency on 29th March 2019. This included a review of the conceptual model in the GRA and the groundwater model and confirmed that the modelling is representative of the groundwater system and the GRA remains valid.</p> <p>The Applicant is continuing to engage with the EA on this matter.</p>
<p>To date, no assessment of the likely impacts of any construction dewatering that may be required has been undertaken. In earlier discussions it was indicated that dewatering would not be required, however the DCO states that the requirement for dewatering will be minimised. We understand that such works are to be designed by the applicant who will also be responsible for obtaining the relevant abstraction licence and any associated environmental permit for discharge (if applicable). Any such dewatering will require further assessment of risks to controlled waters.</p>	<p>It is confirmed that the need for dewatering will be minimised as far as reasonably practicable. Any dewatering design by the contractor will be subject to Environment Agency approval, pursuant to their Protective Provisions in the DCO [APP-020].</p>
<p>It is possible that consumptive abstraction, which result in a net loss of water to the environment (e.g. during concrete batching), may also be sought to support the construction of the Scheme. We have previously advised that resources are already restricted in the catchment and changes to the licensing strategy are underway that will likely lead to greater restriction in the future. We advised that groundwater</p>	<p>The likely restrictions to abstraction are understood and alternative water sources are being sought. If at the construction phase a consumptive abstraction is deemed necessary by the contractor, this would be subject to Environment Agency approval, pursuant to their Protective Provisions in the DCO [APP-020].</p>

Matter Raised	Highways England's Response
<p>abstraction should not be relied upon and other sources should be secured. We offered to provide further comments if the applicant could provide details of what abstraction may be required (volumes, durations, etc.). To date, no further information or correspondence has been received on this matter.</p>	<p>As part of this process, the EA will be fully consulted on the detailed design, changes to construction method and any subsequent risk assessment and identification of any required mitigation measures, if it is confirmed that dewatering/abstraction will be required.</p>
<p>Due to the sensitivity of groundwater resources in the area and lack of detail on any proposed abstraction, we cannot at this stage agree to the disapplication of abstraction licensing as proposed in the draft DCO and Consents and Agreements Position Statement. We are currently looking to agree protective provisions with the applicant, so we can update Examining Authority in due course.</p>	<p>The Applicant has sought to disapply this licensing requirement which is consistent with precedented DCOs such as the Silvertown Tunnel Order 2018; given it is permitted by the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 (with EA consent), and for a tunnelling project such as the Scheme, ensures that as many consents as possible are pursued within the framework of the protective provisions.</p> <p>Draft protective provisions have been provided to the EA for their comment.</p> <p>The Applicant will continue to discuss the issue with the EA and progress will be captured in the statement of common ground being prepared with the EA to be submitted to the Examination in due course.</p>
<p>The documents submitted with the DCO application (Environmental Statement, Drainage Strategy, Outline Environmental Management Plan, etc.) contain insufficient detail regarding the drainage strategy and in particular the likely effectiveness of the treatment systems (infiltration basin lining) in dealing with contaminants prior to discharge of runoff to ground (or surface waters). We therefore require confirmation that treatment will adequately deal with contaminants and sufficient capacity and flow control procedures will ensure that potentially contaminated runoff will be adequately contained under normal operations and as a result of accidents/spillages.</p>	<p>Highways England considers that there is sufficient information provided in the application regarding the drainage strategy. The detailed design of the Drainage systems, including the vegetative treatment systems, would be in accordance with the requirements and advice contained with the Design Manual for Roads and Bridges. The requirements and advice for drainage design contained within the DMRB ensure the design meets requirements in terms of water quality, spillage control and compliance with WFD objectives.</p> <p>The Road Drainage Strategy [APP-281] gives an indication of the drainage proposals for the Scheme at this stage of the design and includes reference to drainage design (such as carrier pipes), infiltration basins and drainage treatment to deal with contaminants under normal operations and as a result of accidents or spillages.</p>

Matter Raised	Highways England's Response
	<p>Paragraph 10 of Schedule 2 of the DCO [APP-020] sets out that written details of surface water drainage proposals for each part of the Scheme must be approved by the Secretary of State, which must be based on the mitigation measures included in the ES, which include the Drainage Strategy.</p>
<p>Infiltration area invert levels are stated to be 1m above high groundwater level. Whilst this value may be linked to the SUDS Manual guidance (CIRIA C753 2015), it is unclear from the information submitted that this is sufficient to allow adequate attenuation of contaminants in these sensitive locations.</p>	<p>The infiltration basins would be lined with material designed to retain the majority of contaminants, as set out at para 3.2.3 of the Road Drainage Strategy [APP-281]. Any that do pass through this layer would be attenuated in the unsaturated layer, which is the layer of ground between the bottom of the basin and the top of the groundwater table. This is designed to be at least 1m. In developing the drainage strategy, the design takes the highest peak groundwater level recorded as the high groundwater level, not the typical winter high, and is therefore able to accommodate a worst-case scenario, see paragraph 2.4.4 of the Road Drainage Strategy.</p>
<p>From a contaminated land perspective, several sites have been identified that have had potentially contaminative historical uses (namely former military installations). There has been no site-specific ground investigation in these areas to determine the presence or absence of contamination that may be disturbed during the proposed works and pose a risk to groundwater in the underlying principal aquifer.</p>	<p>The ES at paragraph 10.6.90 and 10.6.91 and Appendix 10.2 [APP-274] indicates that the risks arising from these sites is likely to be low.</p> <p>However, and as foreshadowed by the ES (paragraph 10.8.2), since the ES submission a package of ground investigation referred to as Phase 7 has been scoped by Highways England to provide geotechnical, hydrogeological and geo-environmental information for detailed design. This scope includes exploratory holes and geo-environmental testing along the route alignment specifically targeting key potentially contaminative sites including the former RAF Oatlands Hill, former RAF Stonehenge and current Countess filling station.</p> <p>These investigations would precede construction and, in the event that contamination not identified in the ES was discovered, remediation options and strategies would be developed in liaison with the EA, pursuant to the process set out by the DCO requirement at Schedule 2 paragraph 7 of the DCO [APP-020].</p>

Matter Raised	Highways England's Response
<p>Spatial coverage of geo-environmental testing is limited considering the extent of the Scheme and does not cover potential source areas identified in Table 10.7 of the Environmental Statement. Therefore, targeted investigation of potential sources of contamination is required to allow adequate assessment of risks to controlled waters. We note that further ground investigation is proposed in paragraph 10.8.2 of the Environmental Statement, and potentially remediation of sites if contamination found. However, the DCO lacks the specific requirement for further site investigation, risk assessment, remediation and verification of areas identified as having potentially contaminative past uses</p>	<p>In carrying out the Phase 7 ground investigations described above, Highways England are following the CLR11 process as outlined in paragraph 10.3.5 of the Environmental Statement [APP-048]. In addition to the requirement at paragraph 7 of Schedule 2 of the DCO referenced above, this process is secured through item PW-GEO1 and MW-GEO1 of the OEMP [APP-187]. The OEMP is secured through paragraph 4 of Schedule 2 to the DCO [APP-02].</p>
<p>We will require the DCO to include a requirement that prior to works commencing that the applicant undertakes a strategy for dealing with risk from contaminated land from the historic uses. This strategy will need to include the following components:</p> <ol style="list-style-type: none"> 1. A preliminary risk assessment which has identified: all previous uses; potential contaminants associated with those uses; a conceptual model of the site indicating sources, pathways and receptors; and potentially unacceptable risks arising from contamination at the site. 2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. 3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. 4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action <p>In addition to the above, prior to operation of any part of the permitted</p>	<p>The OEMP at item PW-GEO1 [APP-187] (secured through paragraph 4 of Schedule 2 to the DCO [APP-020]) includes commitments to undertake all ground investigation works in accordance with BS 5930:2015 Code of Practice for ground investigations and BS 10175:2011 + A2:2017 Investigation of potentially contaminated sites Code of Practice. The assessment of contaminated land will be risk-based and in accordance with the Environment Agency's Contaminated Land Report 11 'Model Procedures for the Management of Land Contamination' (2004). The approach established in these documents requires a phased approach to contaminated land assessment. A preliminary risk assessment was included within the Preliminary Sources Study Report [APP-276] appended to Chapter 10 of the ES [APP-048]. The level of ground investigation at completion of the ES is considered commensurate with the DCO design and further ground investigation is planned as the detailed design develops (Phase 7).</p> <p>A qualitative contaminated land assessment of the available ground investigation data is presented in the Ground Investigation Report (GIR) [APP-273] that is appended to Chapter 10 of the ES [APP-048]. Future planned ground investigations will inform the need for, and scope of, remediation strategies and works, pursuant to paragraph 7 of Schedule 2 to the DCO.</p>

Matter Raised	Highways England's Response
<p>development or sub-section as agreed with the Planning Authority, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.</p>	
<p>The OEMP lacks specific measures to mitigate risks posed by the drainage strategy. There is just a general requirement for the surface water drainage system to include mitigation identified in the Environmental Statement. This links to the DCO Requirement 10 which requires the Scheme to be approved prior to construction.</p> <p>There are specific areas that we request to be updated prior to the examination:</p> <p>MW-WAT1 - General statement requiring works undertaken using methods that protect controlled waters from pollution. Could be applied to secure a number of identified control measures (e.g. – drainage scheme) but we would request more explicit measures to be stated in this document.</p> <p>MW-WAT2 – Requires Water Management Plan to list receptors however, doesn't require any further risk assessment or mention specifics. Therefore, there is a lack of detail on what must be included in the Water Management Plan? (More detail is included for requirements of Groundwater Management Plan – MW-WAT10)</p> <p>MW-WAT7 – 50m default Source Protection Zone 1 should be applied to any (unlicensed) private potable abstractions, not just licensed sources.</p>	<p>Figure 8.1 in the Road Drainage Strategy [APP-281] indicates the maintenance requirements for sustainable drainage systems. The Drainage Strategy is based on the requirements and advice for drainage design contained within the DMRB to ensure the design meets requirements in terms of water quality, spillage control and compliance with WFD objectives. Paragraph 10 of Schedule 2 of the DCO [APP-020] sets out that written details of surface water drainage proposals for each part of the Scheme must be approved by the Secretary of State, which must be based on the mitigation measures included in the ES, which include the Drainage Strategy.</p> <p>As required by the OEMP [APP-187], the EA will also be consulted as the Construction Environmental Management Plan (CEMP) is developed by the contractor, including the contents of the Water Management Plan and in relation to pollution control. This will be when the detail on these matters is able to be provided; however the Applicant notes that items MW-WAT 3, 4, 5 and 7 also provide more information in relation to pollution control issues. Compliance with the OEMP is secured through paragraph 4 of Schedule 2 to the DCO.</p> <p>There are no areas designated as Source Protection Zone 1 within the Scheme's boundary, so this suggestion is not necessary.</p> <p>The Applicant continues to engage with the Environment Agency on these matters, which will be reflected in the SOCG between the parties to be submitted to the Examination in due course.</p>

Matter Raised	Highways England's Response
<p>MW-WAT9 – This includes a requirement for Environment Agency approval of ground treatment materials, this should include drilling fluids used in tunnel boring.</p>	
<p>The Water Quality Risk Assessment suggests 60% probability that a serious spill will lead to serious pollution incident. Given the sensitivity of the local water environment the drainage strategy should provide better protection.</p>	<p>The probability that a serious pollution incident will occur as a result of a serious spillage for a rural setting is identified in DMRB 11.3.10 as 60%. The annual risk probability of a spillage leading to a serious pollution incident is determined by multiplying (a) the annual probability of a serious spillage with the potential to cause a serious pollution incident by (b) the probability that a serious pollution incident will occur as a result of the serious spillage (i.e. 60% in this instance). The water quality risk assessments have shown that all catchments have an annual risk probability of a spillage leading to a serious pollution incident of less than 0.5%, which is very low. This meets the higher standard of protection in accordance with DMRB 11.3.10 Method D, given the sensitivity of the receiving waterbodies. Highways England is therefore of the view that the drainage strategy provides an appropriate level of protection which accounts for the sensitivity of the local water environment and better protection is not required.</p> <p>The drainage system for the Scheme, which is summarised in ES Appendix 11.3, Road Drainage Strategy [APP-281] has been designed in accordance with DMRB. The water quality risk assessments for the drainage scheme, provided in ES Appendix 11.1, Water Quality Risk Assessments [APP-184], outline that during operation, there is likely to be a reduced risk of pollution from road run-off, compared with the current situation.</p> <p>Paragraph 10 of Schedule 2 of the DCO [APP-020] sets out that written details of surface water drainage proposals for each part of the Scheme must be approved by the Secretary of State, which must be based on the mitigation measures included in the ES, which include the Road Drainage Strategy.</p>

Matter Raised	Highways England's Response
<p>There has been no assessment of effectiveness of infiltration basin lining treatment material, and no consideration of down-gradient receptors (abstractions). The indicative method put forward may be an acceptable engineered solution, but it only covers a limited range of contaminants and it also requires maintenance / replacement over its life and after any incidents. It therefore essential that within the DCO and supporting documentation that the detailed design of the drainage infrastructure is agreed with us, to ensure all potential contaminants are included, and details of the how it will be monitored and maintained over its lifetime. This is critical in ensuring that the Scheme does not adversely impact on the local water environment.</p>	<p>The treatment material chosen to line the infiltration basins will be determined during detailed design. The impact on downstream receptors, with the drainage strategy taken into account is assessed through the water quality risk assessments provided in ES Appendix 11.1, Water Quality Risk Assessments [APP-184] using a method agreed with the EA.</p> <p>The detailed design of the drainage systems, including the vegetative treatment systems, will be in accordance with the requirements and advice contained with the Design Manual for Roads and Bridges. The requirements and advice for drainage design contained within the DMRB ensure the design meets requirements in terms of water quality, spillage control and compliance with WFD objectives. Paragraph 10 of Schedule 2 of the DCO [APP-020] sets out that written details of surface water drainage proposals for each part of the Scheme must be approved by the Secretary of State, which must be based on the mitigation measures included in the ES, which include the Road Drainage Strategy [APP-281].</p>
<p>Groundwater Risk Assessment October 2018 have been updated since previous comments made on the July 2018 version in August 2018. A number of minor text amendments have been made to clarify points</p>	<p>The Applicant submitted pump testing and updated risk assessment results to the Environment Agency on 21 January 2019.</p> <p>The results of additional model runs and the analysis of monitoring data collected in the past year were submitted to the Environment Agency on 29th March 2019. This included a review of the conceptual model in the GRA and the groundwater model and confirmed that the modelling is representative of the groundwater system and the GRA remains valid.</p> <p>The Applicant is continuing to engage with the EA on this matter.</p>
<p>Annex 1 to the GRA (Numerical Model Report) has also been updated with minor text changes in October 2018 following previous comments on the July 2018 version. However, not all comments have been addressed and we understand that further work is being carried out by AECOM following review of pump test data and receipt of peer review of modelling work and this further information will be shared prior to the examination. As indicated previously we must ensure that this information is received by us in a timely manner to ensure that we can review it prior to the examination</p>	<p>As discussed above, this information has been produced and submitted to the EA on 29th March 2019.</p> <p>These reports confirm that the modelling is representative of the groundwater system and the GRA remains valid.</p> <p>The Applicant is continuing to engage with the EA on this matter.</p>

Matter Raised	Highways England's Response
stage.	
<p>Due to existing pressures on water resources in the area, proximity to surface waters reliant on baseflow from groundwater and protected water rights of existing abstractors, any abstraction sought to support the proposed development will require risk assessment to ensure the requirements of the environment and existing protected rights are adequately safeguarded. The abstraction licensing process would ensure this is carried out, and we therefore currently do not agree to the disapplication of permits that requires the licensing of abstractions.</p>	<p>The Applicant has sought to disapply this licensing requirement which is consistent with precedented DCOs such as the Silvertown Tunnel Order 2018; given it is permitted by the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 (with EA consent), and for a tunnelling project such as the Scheme, ensures that as many consents as possible are pursued within the framework of the protective provisions.</p> <p>The Applicant will continue to discuss the issue with the EA and progress will be captured in the statement of common ground being prepared with the EA to be submitted to the Examination in due course.</p>
<p>It is understood that the contractor appointed to construct the Scheme will be responsible for the detailed design, including dewatering and any other abstraction that may be required and that this design will come after any Development Consent is granted. We therefore do not consider it appropriate for the applicant to request the potential authorisation of as yet unspecified abstractions to be included in the Development Consent Order.</p>	<p>The Applicant has sought to disapply this licensing requirement which is consistent with precedented DCOs such as the Silvertown Tunnel Order 2018; given it is permitted by the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 (with EA consent), and for a tunnelling project such as the Scheme, ensures that as many consents as possible are pursued within the framework of the protective provisions.</p> <p>The Applicant will continue to discuss the issue with the EA and progress will be captured in the statement of common ground being prepared with the EA to be submitted to the Examination in due course.</p>
<p>As highlighted above, to date, no assessment has been made of likely impacts from dewatering abstractions or any other abstractions that may provide water for the construction of the Scheme. Without details of such abstractions we cannot comment on the likelihood that an application for a licence will be successful.</p>	<p>The Applicant highlights that these elements will be a matter of detail, however the disapplication in the DCO does not mean that the EA will not have the opportunity to approve the detail - this will be retained through the operation of the Protective Provisions.</p>

Matter Raised	Highways England's Response
<p>We have advised the applicant that any proposed consumptive abstraction (e.g. for concrete batching during construction) may have time limitations or volumetric restrictions based on the local environmental conditions. There is a very high chance that due to the sensitivities of the area a consumptive licence would not be issued. Especially due to the local water interests and their linkages to the water-based conservation designations. Therefore, further details are required to be agreed with regards to the construction techniques to ensure that there are no impacts on the water environment.</p>	<p>The likely restrictions to abstraction are understood and alternative water sources are being sought. If at the construction phase a consumptive abstraction is deemed necessary by the contractor, this would in any event be subject to Environment Agency approval, pursuant to their Protective Provisions in the DCO [APP-020].</p>
<p>During our pre-application discussions, with the applicant, they indicated that the preferred method would result in no de-watering during construction. We note that within the DCO information submitted it now indicates that de-watering it is now to be minimised. Further understanding of the likely de-watering position is expected to be refined within the outstanding groundwater information, from the pump testing and the updated groundwater risk assessment. This information should be used to demonstrate the understanding of the groundwater conditions during construction and refine the potential for groundwater de-watering during construction.</p>	<p>It is confirmed that the need for dewatering will be minimised as far as reasonably practicable. The understanding of the groundwater system will be provided to the contractor to assess dewatering needs. Additional calculations or modelling will be conducted to assess the environmental risks as appropriate during detailed design or construction.</p> <p>Records of ongoing engagement on this matter will be captured in the statement of common ground being prepared with the EA to be submitted to the Examination in due course, however in any event, the detail of any dewatering that will be required will be subject to Environment Agency approval, pursuant to their Protective Provisions in the DCO [APP-020].</p>
<p>At the detailed design stage, we will require further information, which could be secured through requirements on the order. This will include:</p> <p>Further historic contamination mitigation measures required during the construction phase, including any necessary remediation works.</p> <p>The dewatering impact assessment and mitigation measures.</p> <p>The groundwater monitoring programme.</p>	<p>As noted above, the Applicant has and will continue to share information with the EA on these points.</p> <p>Above and beyond this however, these elements will already be able to be controlled by the EA pursuant to their protective provisions and through the OEMP [APP-187].</p> <p>The Applicant will continue to engage with the EA on the wording of the DCO and the OEMP through the Examination.</p> <p>Records of ongoing engagement on this matter will be captured in the statement of common ground being prepared with the EA to be submitted</p>

Matter Raised	Highways England's Response
<p>Updated groundwater risk assessment based on detailed design to include impacts on levels and flows.</p> <p>Confirmation of adequate provision for the containment of contaminated runoff from the Scheme.</p> <p>Confirmation that treatment of runoff will be sufficient to ensure discharges to the environment are acceptable.</p>	<p>to the Examination in due course</p>

Matter Raised	Highways England's Response
<p>Although we generally agree with the principles on the submitted flood risk assessment (FRA), the hydraulic modelling for understanding the baseline condition for the River Avon is still being developed by AECOM. We have meet with AECOM (20th December) where we discussed the work needed to complete the baseline condition modelling and we understand AECOM will seek agreement with the applicant to carry out this work required for the DCO submission. This approach is fundamental to agreeing the principle of the flood risk conditions in relation to the proposed works, and the acceptability of the Scheme. Without agreeing the baseline, we cannot agree to any of the submitted FRA and Environmental Statement, as it has not been demonstrated that the applicant understands the likely flood risk conditions and impacts adequately.</p> <p>We shared our preliminary comments about the FRA with AECOM / the applicant (November 2018) and these were discussed further at our recent meeting. We agreed the final FRA, to include the final baseline condition modelling, will need to demonstrate:</p> <ul style="list-style-type: none"> • No increase in flood risk to third parties as a result of the permanent works and temporary works associated with the construction of the Scheme; and • Any loss of floodplain storage as a result of the proposed scheme will be fully compensated for, and where possible some betterment will be offered. <p>We are aware that applicant has committed to conclude the flood risk modelling to support the FRA prior to the examination. It is essential that this is agreed prior to the examination as the FRA provides the commitment to act on the findings of this information. However, we have concerns regarding the timeliness of us receiving this information, as we currently anticipate that it will be a minimum of 4 weeks work, once it commences. Plus, it maybe several weeks of resource for us to review and agree the modelling, resulting in the potential for it to be up to 8 weeks before this position can be agreed. Therefore, it is critical that the applicant ensures that the flood modelling is completed as soon as possible, and the FRA updated to reflect any findings to prior to the examination.</p>	<p>The baseline and proposed representation of flood risk associated with the River Avon was submitted to the Environment Agency in February 2019. The outcome of this study confirms that the Environment Statement (ES) presents a clear and robust representation of the baseline scenario, sufficient for assessment of flood risk, as reported in ES Chapter 11, Road Drainage and the Water Environment [APP-049]. The assessment demonstrates and concludes that there would be no significant increase to flood risk as a result of the Scheme and, as such, there is no requirement for the provision of floodplain storage compensation. The updated FRA will be submitted to the Environment Agency at Deadline 2 of the Examination.</p> <p>Records of ongoing engagement on this matter will be captured in the statement of common ground being prepared with the EA to be submitted to the Examination in due course.</p>

Matter Raised	Highways England's Response
<p>The OEMP states “The main works contractor shall ensure that hoarding and fencing in areas at risk of flooding, most notably within the River Till floodplain, will be permeable to floodwater, unless otherwise agreed with the Environment Agency, to ensure that the fluvial floodplain and areas liable to other sources of flooding continue to function effectively for storage and conveyance of floodwater.”</p> <p>Whilst we support with this commitment; it should also apply to the River Avon floodplain.</p>	<p>This matter has been discussed with the Environment Agency and it is agreed that this requirement will be addressed in the next iteration of the Outline Environmental Management Plan (OEMP) [APP-187] which will be provided during the course of Examination. The OEMP is secured through paragraph 4 of Schedule 2 of the draft Development Consent Order [APP-020]. Agreement on this issue will be captured in the statement of common ground being prepared with the EA to be submitted to the Examination in due course.</p>
<p>The OEMP states “Protection of watercourses: The contractor shall incorporate protection measures for works in or adjacent to watercourses in accordance with requirements set out by the Environment Agency. Insofar as it is not dealt with in the DCO, approval will be obtained in advance for all crossings of, diversions to, and work affecting watercourses from the Environment Agency. Sufficient allowance will be made for the Environment Agency to issue a flood risk activity environmental permit. Insofar as it is not dealt with in the DCO, appropriate protective provisions will be agreed with the Environment Agency for works under, over or within a river channel and within 8m of a non-tidal river.”</p> <p>We currently have not agreed protective provisions with the applicant, in relation to this matter, but we will update the Examining Authority in due course.</p>	<p>Draft protective provisions have been provided to the EA for their comment.</p> <p>Discussion with the EA on the protective provisions included in the DCO for the benefit of the EA are on-going and will be agreed during Examination.</p>

Matter Raised	Highways England's Response
<p>The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution.</p> <p>Similarly, the Governments 25 Year Environment Plan (February 2018) has policy for embedding an 'environmental net gain' principle for development, including housing and infrastructure. Therefore, we expect that all developers, both public and private, to demonstrate how they can deliver this. In regards to this Scheme, we consider that this would be through river restoration which links to public open space. These enhancement opportunities offer the ability to provide a multi-functional space that deliver multiple benefits to the environment and the community.</p> <p>The DCO submission confirms that there will be no adverse impacts on the water environment, but it does not commit to delivering a comprehensive scheme for enhancement of this specific environment. Enhancement of the water environment should be linked to proposed land use and habitat changes, footpath design and fencing, compaction, maintenance regime, etc. In this location we have highlighted a key location that we consider the applicant should enhance as part of this scheme, as a minimum. As it links to the historic installation of the highway and modification to River Avon. The applicant should also be looking to enhance the environment River Till.</p> <p>We have requested that the applicant contribute towards the River Avon Restoration Plan (RARP) as part of the schemes requirements to provide net gain / environmental improvements. There are ongoing discussions on the delivery of the relevant RARP actions as part of the legacy for the scheme, but currently there is no final commitment to how this could be delivered within the DCO. There is only commitment to continue discussion through an Environmental Forum.</p> <p>We consider that there should be a greater commitment through the DCO</p>	<p>HE will be able to demonstrate substantial net gains for biodiversity of priority habitat type, for example improving the ecological network connectivity between Parsonage Down and the Till valley and the provision of a bat hibernation structure at the Till valley. The Scheme will contribute to the improved habitat connectivity identified as a priority in Natural England's Porton to the Plains project.</p> <p>The Scheme will contribute to environmental net gain by the habitat creation, but in this case the priority habitats agreed with Natural England and other biodiversity stakeholders are chalk grassland and associated habitats. The River Till will benefit through improved connectivity. The Scheme will also provide improved recreational access, including access to wildlife, via public rights of way.</p> <p>Full details of the biodiversity gains can be found in the ES Chapter 8 [APP-046], Sections 8, 8.8.14 – 8.8.21, 8.9.65 – 8.9.66, and Table 8.14, Habitat losses and gains associated with the Scheme. As Table 8.14, the scheme would provide net gain of at least 186 ha of chalk grassland habitats. This contributes to targets to increase the area of chalk grassland and its connectivity as described in the Porton to the Plain project by Natural England (in the SoCG with Natural England). The Scheme is therefore compliant with the NPPF principle of contributing to conserving the natural environment and to enhancing it.</p> <p>The enhancements sought in the River Avon are not within land required for the Scheme and cannot be provided as part of the DCO.</p> <p>These initiatives fall outside of the scope of the DCO. Through national Designated Funds HE is supporting a range of environmental enhancement initiatives where these contribute to meeting the fund objectives nationally or regionally. Funding is independent of the Scheme. Opportunities are under discussion through the Biodiversity Working Group of Benefits Steering Group, which includes representation from the Environment Agency and other biodiversity stakeholders.</p>

Matter Raised	Highways England's Response
<p>for the development of enhancements of the scheme to deliver wetland habitats and improved river conditions.</p> <p>As indicated above the National Planning Policy Framework core principle for planning is that it should contribute to conserving and enhancing the natural environment, in this regards we consider that the current scheme is only meeting the first part of this statement.</p>	<p>In relation to wetlands and river habitats, the Scheme will provide improvement of highway drainage compared to existing conditions, contributing to improving river conditions. Through the use of Sustainable Drainage Systems (SuDS), the Scheme will deliver a significant improvement in road drainage quality against the existing system, which is likely to result in a moderately beneficial residual effect for water quality in the River Avon, as summarised in ES Chapter 11, Road Drainage and the Water Environment [APP-049], Table 11.10. The Environment Agency agrees this significant benefit is likely, which will be captured in the statement of common ground being prepared with the EA to be submitted to the Examination in due course.</p> <p>New wetland habitats included in the Scheme are small scale habitat diversification associated with drainage infiltration areas (ES Chapter 8 Biodiversity [APP-046], 8.9.106).</p> <p>There is ongoing discussion with the EA on HE's wider environmental enhancement initiatives, independent of the Scheme, and their potential to contribute to the delivery of river restoration objectives for the River Till or River Avon.</p>
<p>There are opportunities to enhance habitats for species, such as the Desmoulins Whorl snail which is acknowledged to be in decline and is a feature of the Special Area of Conservation designation.</p>	<p>The locations where Desmoulins whorl snail occurs are adjacent to the River Avon, beyond the limits of the land required for the Scheme. They will not be affected by construction and the water regime will not be affected by the Scheme, as set out in ES Chapter 8, Biodiversity [APP-046], paragraph 8.9.18, and 8.9.87 – 8.9.89.</p> <p>Desmoulins Whorl snail is not present in studied sections of Till valley. The section of the Till valley crossed by the Scheme is a winterbourne and only flows for a few months a year. The habitat near the viaduct is not suitable for enhancement for the snail, as set out in ES Chapter 8, Biodiversity [APP-046], paragraph 8.9.18, and 8.9.87 – 8.9.89.</p> <p>There is ongoing discussion with the EA on HE's wider environmental enhancement initiatives, independent of the Scheme, and their potential to</p>

Matter Raised	Highways England's Response
	contribute to the delivery of river restoration objectives for the River Till or River Avon.
<p>There remains a risk of impact on the River Till and Avon during construction, which will be minimised through appropriate construction methodology (including pollution control measures and invasive species).</p> <p>This will need to be adequately detailed in the DCO submission and OEMP.</p>	<p>The OEMP [APP-187] sets out pollution control (PW-WAT1, MW-G20, MW-WAT1, MW-WAT4 and MW-WAT5) and invasive species (PW-BIO1, MW-BIO5, MW-BIO6) measures within it, which would apply to these areas. Compliance with the OEMP is secured through paragraph 4 of Schedule 2 to the DCO [APP-020].</p>
<p>There is a requirement for the scheme to deliver mitigation for Otters, as a protected species. Requirement 6 of the DCO confirms protection and mitigation from the scheme, we would highlight that this should be for both the permanent and temporary works.</p>	<p>During ongoing engagement with the Environment Agency, it has been agreed that suitable mitigation for protected riparian species has been included in the Scheme and will be implemented during construction (items PW-BIO8, MW-BIO3 and MW-BIO12 of the OEMP [APP-187], compliance with which is secured through paragraph 4 of Schedule 2 to the DCO [APP-020]). Otters will be protected during operation through the use of otter fencing, which will guide individuals to safe crossing locations, as described in ES Chapter 8, Biodiversity [APP-046], paragraph 8.9.232. Agreement on this issue will be captured in the statement of common ground being prepared with the EA to be submitted to the Examination in due course.</p>
<p>Silent or vibrational piling methods should be used as agreed in the OEMP. If impact piling is found to be required for the piers required following vibrational piling, then the gradual ramping up of sound to scare fish away before sound levels reach lethal limits should deter those fish able to swim away before the full power of the pile driver is felt through the river. A non-metallic pad between the hammer and the head of the pile can also reduce the impact. The piling method statement should also include details of timings. Percussive techniques would be limited to November-March inclusive in order to avoid key fish spawning and migration periods. If percussive piling techniques are required, then the piling work should be carried out over as short a period as is practical.</p> <p>We currently have not agreed protective provisions with the applicant in relation to this matter but we will update the Examining Authority in due</p>	<p>Provision for low noise piling and risk assessing piling to take account of the environmental constraints is already accounted for within the Outline Environmental Management Plan (OEMP) [APP-187] (MW-G9 and MW-BIO3), which is secured through paragraph 4 of Schedule 2 of the draft Development Consent Order [APP-020].</p>

Matter Raised	Highways England's Response
<p>course if this is to be included.</p>	
<p>Section 6.1 Chapter 8.8.25 (k) states that invasive and non-native species will be identified prior to works and removed, or otherwise managed to prevent their spread; and the OEMP does have a line committing to minimising the risk. However, this feels too broad and unprepared given the extent of the other data gathering exercises. We know that records exist which should have been reviewed, ground truthed, assessed and the controls outlined. Therefore, we will require the applicant to:</p> <ul style="list-style-type: none"> • Undertake full survey and control plan prior to preliminary works commencement needs to be assured and reviewed by the relevant bodies (Environment Agency / Natural England). • Ensure species survey and control/removal measures need to be in accordance with best practice and as per UK strategy http://www.nonnativespecies.org/home/index.cfm • That the appropriate commitment to testing and biosecurity are not just through work operations, but in through ensuring soil movements do not cause invasive species to be spread. • It is essential this needs to be clarified that the management to prevent their spread is applicable during operation (and not just construction), and therefore measures should aim for complete removal and included in maintenance plan until this is achieved. <p>Maintenance plans need to include survey of site once operational and periodically thereafter, and commitment to any residual treatment required, both for known areas/species but also any new areas/species which may have unknowingly arrived in soil transfer.</p>	<p>The requirement for the contractor (all) to manage the risk of the spread of invasive and non-native species is secured through the Outline Environmental Management Plan (OEMP) [APP-187] (PW-BIO1), which in turn is secured through paragraph 4 of Schedule 2 of the draft Development Consent Order [APP-020]. The matter of additional detail, as per the Environment Agency's relevant representation, has been discussed with the Environment Agency and it is agreed between the two parties that the detail of the removal and management of invasive and non-native species will be addressed through the relevant Construction Environmental Management Plans (CEMP). Agreement on this issue will be captured in the statement of common ground being prepared with the EA to be submitted to the Examination in due course.</p>
<p>We support the overall approach to waste and materials that is proposed in the application documents. The level of detail that has been provided on waste types and quantities is acceptable, bearing in mind the uncertainties that exist at this stage of the design process.</p>	<p>Noted, thank you for your comment.</p>

Matter Raised	Highways England's Response
<p>We also support the scheme's construction and excavated materials commitments through the production of Materials Management Plan. This confirms that the tunnel arisings will be looking to comply with the CL:AIRE code of practice, and therefore not be considered a waste.</p>	<p>Noted, thank you for your comment. We acknowledge the Environment Agency's view that "We consider that the Cl:AIRE code of practice should work well with this project. As all material will be contained within the Development Consent Order boundary for the site, we see no reason that this project could not go ahead under Cl:AIRE.", as stated in their letter dated 3 April 2018, included at Appendix 12.1 of the Environmental Statement [APP-285].</p>
<p>The Materials Management Plan is a commitment within the OEMP, and therefore forms part of requirement 4 of the DCO.</p> <p>The applicant seeks to disapply various pieces of legislation (Schedule 11, Part 3), of the draft Development Consent Order submitted with the application).</p> <p>S150 Planning Act 2008 provides that such disapplication can only take place with the consent with Environment Agency.</p> <p>We are currently considering our position in relation to the legislation which is relevant to the Environment Agency. The draft protective provisions included in the draft DCO are similar to those accepted by the Environment Agency in the past, but we are currently reviewing our preferred form of protective provisions.</p> <p>We will be liaising with the applicant on these issues and will provide the Examining Authority with an update in due course. As indicated in our above representations there are critical areas of works that have the potential to affect the local environment that need to be appropriately controlled.</p> <p>We would re-iterate that we are not currently looking to agree disapply Section 24 Water Resources Act abstraction licence, due to the sensitivities in this area.</p>	<p>The EA's comments are noted, and the Applicant will continue to engage with the EA in respect of disapplications and the protective provisions throughout the Examination. Comments and amendments on the standard protective provisions received from the EA were sent by the Applicant to the EA on 22 February 2019.</p>

21 English Heritage Trust (RR-1725)

21.1 Key issues

Table 21-1: English Heritage Trust

Matter Raised	Highways England's Response
<p>English Heritage Trust states that removing the old Stonehenge visitor facilities adjacent to Stonehenge and the grassing over of the A344 in 2013 through [English Heritage's] Stonehenge Environmental Improvements Project have had a significant positive impact for the public and WHS. English Heritage Trust considers that the current proposed A303 road scheme has the potential to further transform the Stonehenge part of the World Heritage Site and make significant improvements to the setting of the Stonehenge monument (which is one of the WHS's attributes of Outstanding Universal Value (OUV)). Provided it is well designed and located sensitively, this scheme could greatly enhance the OUV of the WHS whilst simultaneously improving the setting of Stonehenge itself, and people's experience of them.</p>	<p>Highways England acknowledges the supportive comments from English Heritage Trust in relation to the potential for the Scheme to <i>“transform the Stonehenge part of the World Heritage Site and make significant improvements to the setting of the Stonehenge monument (which is one of the WHS's attributes of Outstanding Universal Value (OUV))”</i>.</p> <p>The design has been developed having regard for the potential impact of the Scheme on the World Heritage Site and its OUV. The preferred route for the Scheme was selected to sustain OUV, by avoiding known archaeological remains, important sites and monuments that contribute to the OUV of the WHS. Subsequent careful and sensitive design development, including mitigation measures to limit or avoid impacts, has been informed by a Heritage Impact Assessment, as set out in ES Appendix 6.1, HIA [APP-195]. This has informed the choice of options for the cutting approach to the tunnel and canopy design over the tunnel entrance in the western part of the WHS, as well as the positioning of a c.150 metre wide green bridge near Longbarrow. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9. The removal of the surface A303 from the WHS landscape would result in extensive benefits for the WHS, including significant reductions in traffic noise, as set out in ES Chapter 9 [APP-047], Section 9.9, and illustrated in Figure 9.4 [APP-167], and visual intrusion, as set out in ES Chapter 7 [APP-045], Section 7.9. The heritage impact assessment (HIA) [APP-195] has concluded that the Scheme would have a Slight Beneficial effect on the OUV of the WHS as a whole (as described in Chapter 12 of the HIA). This takes into account that of the seven attributes of OUV for the WHS, whilst the Scheme would have a slight adverse effect on two of those attributes, it would have a beneficial effect on the remaining five (being a slight beneficial effect on 3 of the attributes, a large beneficial effect on one, and a very large beneficial effect on one). This conclusion also takes into account that the Scheme would have a slight beneficial effect on the authenticity and integrity of the WHS. Overall, the OUV of the WHS would be sustained. The detailed design of the Scheme and its associated infrastructure will be sensitive to the WHS, following Highways England's guide 'The Road to Good Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Goo</p>

Matter Raised	Highways England's Response
	<p>d road design Jan 18.pdf), and design of key elements of the Scheme within the WHS will be developed in consultation with English Heritage Trust. This will be confirmed within a statement of common ground between the parties, to be issued to the Examination in due course.</p>
<p>English Heritage Trust is particularly interested in the design details and finishes of the scheme and how they might impact upon the WHS and its attributes of OUV. It has taken note of the documents provided in the DCO application and understands that the design details of some elements are not provided at this stage. However, given the highly sensitive heritage environment and significance of Stonehenge and the WHS, English Heritage Trust considers that further information is required at this stage in order to properly assess the proposals in order to understand the physical and visual impact of any infrastructure within the WHS - to ensure all elements of the scheme are designed and located to allow the benefits of the scheme within the WHS to be fully realised.</p> <p>These details include the surfaces and extent of proposed Non-Motorised User (NMU)/PROW routes, fencing, signage, lighting, street furniture, the portals, articulation and form of the cutting and walls and the green bridge (within the WHS) design and any other significant</p>	<p>Highways England considers that the application has provided sufficient information to allow the English Heritage Trust to understand and comment on the Scheme. The current proposals for each of the design elements referred to by English Heritage Trust are set out below:</p> <ul style="list-style-type: none"> • The redundant parts of the road surface of the existing A303 and A360 within the WHS would be removed in accordance with references D-CH2 and D-CH3 of the OEMP [APP-187]. Compliance with the OEMP is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020]. The new restricted byway within the WHS would provide a durable surface for non-motorised users including those needing mobility aids, and those vehicles permitted to use the route such as agricultural and maintenance vehicles. Details, including width and surface treatment, are under discussion. The surplus areas of redundant road surface would be replaced by chalk grassland and existing roadside furniture and infrastructure (signage, lighting columns etc.) would be removed (this approach is described in section 2.3.56 (d) of the Environmental Statement (ES) [APP-040]. Other new NMU routes within the WHS (A360 north to the Stonehenge Visitor Centre; A360 South to Druids Lodge) would be of similar form and design and would be constructed at or just above existing ground level and would utilise a no-dig construction solution. There would be no new street furniture adjacent to the new NMU routes and public rights of way. • Fencing in the WHS shall be developed in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council, as secured in the Outline Environmental Management Plan (OEMP) [APP-187] (D-CH14). The main works contractor shall consult with the relevant bodies to determine the type of construction boundary fencing to be used within the WHS or within the setting of the WHS. The type of fencing would be sympathetic to the setting of the WHS. The OEMP is secured under paragraph 4 of Schedule 2 within the draft DCO [APP-020]. • The majority of the Scheme would not be lit. There would be no lighting within the WHS beyond that necessary within the tunnel and beneath the c. 150 metre wide Green Bridge No. 4 (operating during day time only). There would be no lighting within the open cutting, and tunnel lighting would be designed to minimise light spill outside of the tunnel portals. There would be no roadside lighting at the new Longbarrow Junction, and the improved Countess junction would utilise new directional roadside lighting to minimise light spill. These are significant improvements over the current situation, where both Countess and Longbarrow junctions are brightly lit. This lighting is provided for in the Outline Environmental Management Plan (OEMP) [APP-187] (D-CH9 to D-CH12), and paragraph 4 of Schedule 2 of the DCO [APP-020] requires the Scheme to be carried out in accordance with the OEMP; and

Matter Raised	Highways England's Response
<p>changes/introductions.”</p>	<ul style="list-style-type: none"> In the context of the WHS, the Scheme has committed to no signage or other vertical installations (such as CCTV) above the top of the cutting and no lighting of signs at the western end of the Scheme in order to protect the WHS's OUV [see OEMP, D-CH8]. Appropriate signage and infrastructure will also be provided outside the WHS to manage traffic through the corridor. <p>The details of cuttings, walls, and green bridges within the WHS will be developed through the detailed design process in consultation with the English Heritage Trust. This will be confirmed within a statement of common ground between the parties, to be issued to the Examination in due course.</p>
<p>English Heritage Trust “<i>understands that there is potential for the restriction of future archaeological research within the affected part of the WHS (e.g. above the tunnel route). This would be contrary to the provisions of the Stonehenge WHS Management Plan.</i>”</p>	<p>As noted in the Statement of Reasons [APP-023], restrictions are required above the tunnel in order to secure protection of the tunnel from potentially conflicting future development and works that might jeopardise the structural integrity of the tunnel. Highways England acknowledges English Heritage Trust's concerns regarding the tunnel restriction areas and is undertaking further work to provide details of the type of restrictions required. Highways England will continue to engage with English Heritage Trust on this issue.</p>
<p>English Heritage Trust state that, as well as conserving the site of Stonehenge, it is part of English Heritage Trust's remit to welcome visitors to the site hoping that they will inspire people to value, visit and enjoy it. English Heritage Trust wants to ensure visitors have an easy route to the Stonehenge Visitor Centre, both during the construction phases and after the scheme is finished. Ease of access and signage to the Stonehenge Visitor Centre is key to this.</p> <p>The DCO and application papers do not give any detail on what road signage will be installed to ensure it is clear and intuitive for drivers wanting</p>	<p>A detailed signage strategy would be developed during the detailed design stage. It would include clear signing from the A303 directing traffic to use the Longbarrow junction for access to the Stonehenge Visitor Centre. This would be developed in consultation with the relevant bodies, which includes the English Heritage Trust.</p> <p>A traffic management plan is required to be approved and implemented pursuant to paragraph 9 of Schedule 2 of the draft Development Consent Order [APP-020]. As required by the Outline Environmental Management Plan (OEMP) [APP-187], which is secured through paragraph 4 of schedule 2 of the draft Development Consent Order [APP-020], the main works contractor would prepare and implement a detailed Traffic Management Plan (TMP), which would include details of temporary construction signage and access arrangements, in consultation with relevant organisations (MW-TRA2).</p>

Matter Raised	Highways England's Response
<p>to visit Stonehenge. There is a lack of detail on the temporary infrastructure for the construction period therefore English Heritage Trust is unable to assess its impact on the WHS and our visitor operation.</p>	
<p>English Heritage Trust state that they support the opportunity this scheme offers to connect rights of way and remove unnecessary vehicular access within the WHS so that there is increased access and potential for people to explore the landscape on foot or on a bicycle or horse (where appropriate) in order to enjoy and understand Stonehenge within its wider landscape setting.</p>	<p>Highways England acknowledges English Heritage Trust's support for this element of the Scheme design. Connectivity into and through the WHS would be improved through the provision of new and enhanced public rights of way, notably the new route on the line of the old A303, linking Winterbourne Stoke with Amesbury via the WHS. Changes to existing, or creation of new, public rights of way are secured by the development consent order, and are shown on the Rights of Way and Access Plans [APP-009] and described in Schedule 3 to the draft DCO [APP-020].</p>
<p>English Heritage Trust state that, during the public consultation process, English Heritage Trust voiced its objection to the proposal to link existing byways open to all traffic (BOATS) 11 and 12 with a new byway open to all traffic which they believed would create a new line of traffic across the WHS and negatively impact upon views from and towards the Stonehenge monument. English Heritage Trust welcomes the removal of the link but still remains concerned about the negative impact of traffic within the WHS particularly past Stonehenge itself caused by the existing BOATs.</p>	<p>Changing the status of the existing BOATs is beyond the scope of the Scheme and is a matter for Wiltshire Council to consider as the local highway authority. Highways England wish to ensure that the Scheme is integrated within the existing byway network and, where the opportunity exists, create legacy benefits for non-motorised users in accordance with its Strategic Business Plan and Road Investment Strategy, which are aligned with Government policy to encourage walking, cycling & horse-riding through national and local policies and plans. The new public rights of way measures proposed along the Scheme would not only maintain, but would also considerably enhance the existing PRow network, significantly improving connectivity for non-motorised users, as illustrated on the Rights of Way and Access Plans [APP-009].</p>

Matter Raised	Highways England's Response
<p>English Heritage Trust state that it objects to the section of the proposed restricted byway running alongside the A360 within the boundary of the Stonehenge Visitor Centre complex, creating a 4-metre wide byway for pedestrians, cyclists and carriages within the boundary of the Stonehenge Visitor Centre. English Heritage Trust objects to this proposal for the following reasons:</p> <ul style="list-style-type: none"> Potential safety risks particularly conflict between non-motorised byway users and motorised visitors; Potential security risks; Potential negative impact on [English Heritage Trust's] visitor operation; Potential negative knock-on impacts for A360/B3086 road users; Negative impact on design principles of the Stonehenge Visitor Centre; and Negative impact on recent investment in car parking. <p>There are alternative routes that are better that would not give rise to the impacts above, including following, but outside the boundary of the Visitor Centre site. Proposal for the restricted byway across part of the Visitor Centre site was introduced late and there was failure to consult and liaise with English Heritage Trust on the proposed right of way route selected before submission.</p>	<p>Highways England is working with English Heritage Trust to seek to identify an alternative route which addresses its concerns and meets the objective of improving access for non-motorised users. Details of these discussions and any agreement will be recorded in the SOCG with the English Heritage Trust to be submitted to the Examination in due course. Highways England note that English Heritage Trust's alternative route is on land in third party ownership and outside the red line boundary, and so could only be delivered by agreement.</p>

22 Historic England (RR-1897)

22.1 Key issues

Table 22-1: Historic England

Matter Raised	Highways England's Response
<p>Historic England states that the existing A303 trunk road has a substantial adverse impact on the Outstanding Universal Value (OUV) of the WHS and they accept the need to improve the road between Amesbury and Berwick Down.</p> <p>Historic England have engaged with Highways England and other stakeholders to encourage a scheme which delivers benefits to the historic environment while avoiding and minimising adverse impacts. This applies particularly to the Stonehenge component of the WHS and the many other designated heritage assets, together with their settings, within and adjacent to the development limits.</p>	<p>Highways England acknowledge Historic England's comments in relation to the substantial adverse impact that the existing A303 has on the Outstanding Universal Value (OUV) of the WHS and also the need to improve the road between Amesbury and Berwick Down. Highways England agrees that there has been much engagement with Historic England and other stakeholders in the development of the Scheme, a summary of which is presented in the Consultation Report [APP-026], Chapters 2 and 3. Further details of how the Scheme has been developed to avoid and minimise adverse impacts on cultural heritage are provided in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Embedded Mitigation, and Table 6.9.</p> <p>Highways England will continue to engage with Historic England, and other heritage stakeholders, on relevant Scheme matters.</p>
<p>Historic England supports the aspirations of the road scheme proposed in the DCO and believes that it offers the potential to deliver a</p>	<p>Highways England acknowledges the support of Historic England for the aspirations of the road scheme proposed in the DCO. Highways England acknowledges Historic England's statement that the Scheme offers the potential to deliver a beneficial outcome for the historic environment and to sustain the OUV of the WHS. The environmental impacts and significant effects (both positive and negative) on heritage assets, are set out in</p>

Matter Raised	Highways England's Response
<p>beneficial outcome for the historic environment and to sustain and enhance the OUV of the WHS, by putting much of the current surface road into a bored tunnel and allowing archaeological features currently separated by the A303 to be appreciated as part of a reunited landscape.</p> <p>However, if this potential is to be realised in practice we believe it is essential for a number of matters to be addressed satisfactorily, as set out in the below RR issues.</p>	<p>ES Chapter 6, Cultural Heritage [APP-044], Section 6.9, and the Heritage Impact Assessment on the OUV of the WHS, ES Appendix 6.3 [APP-195].</p> <p>Highways England will continue to engage with Historic England, and other heritage stakeholders, on relevant Scheme matters.</p>
<p><i>Historic England states that "PINs issued a S51 letter requesting various documents to be submitted and the Applicant has now responded. Although relationships between these documents have been clarified, [Historic England] are concerned that a number of items, which [Historic England] consider to be of key importance to the examination of the DCO, are not yet available:</i></p> <ul style="list-style-type: none"> • <i>the Detailed Archaeological Mitigation Strategy (DAMS);</i> • <i>an Overarching Written Scheme of Investigation to accompany the DAMS;</i> • <i>a Preliminary Outline Environmental Management Plan for preliminary works including archaeological mitigation. The</i> 	<p>Highways England acknowledge Historic England's comments and note the following:</p> <ul style="list-style-type: none"> • A Detailed Archaeological Mitigation Strategy (DAMS) is being developed, from the Outline Archaeological Mitigation Strategy (OAMS) which was submitted with the DCO application, in consultation with the relevant bodies, which includes Historic England. Initial discussions on the DAMS have commenced with our Heritage Partners and will be ongoing throughout the Examination process in order to finalise the document. The DAMS is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order (DCO) [APP-020]. The draft DAMS will be submitted into the Examination for the second deadline; • The Overarching Written Scheme of Investigation is part of the DAMS (being consulted on with the relevant bodies as referred to above); • The REAC table 3.2a of the Outline Environmental Management Plan (OEMP) and the annexed OAMS have been submitted as part of the DCO application and provide sufficient information for the decision-making process at this stage and to allow ongoing consultation and comment on the Scheme with the relevant bodies, including Historic England. Implementation of the OEMP is secured by paragraph 4 of Schedule 2 of the draft DCO. Highways England's appointed contractor will be required to develop and implement a detailed Construction Environmental Management Plan (CEMP) which will be based on, and incorporate, the requirements of the OEMP; and • A full and comprehensive programme of archaeological evaluation surveys has been completed. The completed archaeological evaluation reports have been developed in consultation with the relevant bodies, including Historic England. The results of the archaeological evaluations were either considered, or confirm the survey data considered, for the submission of the ES and the HIA. The archaeological evaluation reports

Matter Raised	Highways England's Response
<p><i>Applicant's response to the S51 advice indicated that the REAC table 3.2a of the OEMP provided specific measures to apply to works. However, this contains insufficient detail given the very high sensitivity of the proposal; and</i></p> <ul style="list-style-type: none"> <i>completed archaeological evaluation reports for the scheme. These are essential to a proper understanding of the archaeological impacts of the scheme and of the basis on which the DAMS has been drawn up"</i> 	<p>confirm the archaeological baseline and the approach to mitigation. These have been reviewed in line with the ES tables that detail the impacts and the significance of effects (Section 6.9 in Chapter 6 and Appendix 6.8). No additional significant effects have been identified.</p>
<p>Historic England states that there is an absence of detailed proposals for: design and visual representations for key elements of infrastructure within the WHS, including the western tunnel portal and its extension, the eastern tunnel portal, the articulation and form of open cutting retaining walls and the design, construction, form and appearance of Green Bridge 4.</p>	<p>Highways England considers the application is sufficiently detailed to allow Historic England to understand and comment on the Scheme. In particular photomontages and CGI visualisations have been presented within the LVIA Chapter (Chapter 7 [APP-045]) and Cultural Heritage Chapters (Appendix 6.9 [APP-218]) of the ES. Design and visual representations will be developed through the detailed design process. The further detailed design of the portal and its associated infrastructure will be sensitive to its WHS context, following Highways England's guide 'The Road to Good Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf), and will be developed in consultation with Historic England. This will be confirmed within a statement of common ground between the parties, to be issued to the Examination in due course.</p>
<p>Historic England states that there is an absence of detailed proposals for:</p> <ul style="list-style-type: none"> proposed Non-Motorised User (NMU) routes, their articulation and form, and how they relate to sections of the A303 and A360 made redundant by the Scheme; the removal of road infrastructure that will be made redundant by the scheme and the proposed 	<p>The redundant parts of the road surface of the existing A303 and A360 within the WHS would be removed in accordance with references D-CH2 and D-CH3 of the OEMP [APP-187]. Compliance with the OEMP is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020]. The new restricted byway within the WHS would provide a durable surface for non-motorised users including those needing mobility aids, and those vehicles permitted to use the route such as agricultural and maintenance vehicles. Details, including width and surface treatment, are under discussion. The surplus areas of redundant road surface will be replaced by chalk grassland and existing roadside furniture and infrastructure (signage, lighting columns etc.) would be removed (this approach is described in section 2.3.56 (d) of the Environmental Statement (ES) [APP-040]. Other new NMU routes within the WHS (including the A360 north to the Stonehenge Visitor Centre; the A360 South to Druids Lodge; NMU route across Green Bridge No. 4) would be of the same width and design to those utilizing</p>

Matter Raised	Highways England's Response
<p>reinstatement of land within the former highway boundary beyond that required for new NMU routes. There is also uncertainty about the relationship between the byways proposed by the scheme and the implications of the recent Experimental Traffic Regulation Order</p>	<p>redundant stretches of the A303 and the A360 and would be constructed at or just above existing ground level and would utilize a no-dig construction solution.</p> <p>The Scheme's proposals for changes to existing, or creation of new, public rights of way, as shown on the Rights of Way and Access Plans [APP-009] and secured by the draft Development Consent Order [APP-020], are entirely independent of Wiltshire Council's previously placed experimental Traffic Regulation Order (TRO). The permanent downgrading of Byways 11 and 12, should this outcome be achieved by Wiltshire Council, would have no foreseeable impact on the Scheme's PRow proposals.</p> <p>The design of these elements will be developed through the detailed design process in consultation with Historic England. This will be confirmed within a statement of common ground between the parties, to be issued to the Examination in due course.</p>
<p>Historic England states that there is an absence of detailed proposals for: lighting, signage, fencing, drainage, balance ponds, landscaping including tree planting in and adjacent to the WHS;</p>	<p>Highways England considers there is sufficient information provided in the application. The current proposals for each of these design elements is set out below:</p> <ul style="list-style-type: none"> • The majority of the Scheme will not be lit. There would be no lighting within the WHS beyond that necessary within the tunnel and beneath the c. 150 metre wide Green Bridge No. 4 (operating during day time only). There would be no lighting within the open cutting, and tunnel lighting would be designed to minimise light spill outside of the tunnel portals. There would be no roadside lighting at the new Longbarrow Junction, and the improved Countess junction would utilise new directional roadside lighting to minimise light spill. These are significant improvements over the current situation, where both Countess and Longbarrow junctions are brightly lit. This lighting is provided for in the Outline Environmental Management Plan (OEMP) [APP-187] (D-CH9 to D-CH12), and paragraph 4 of Schedule 2 of the DCO [APP-020] requires the Scheme to be carried out in accordance with the OEMP. • In the context of the WHS, the Scheme has committed to no signage or other vertical installations (such as CCTV) above the top of the cutting and no lighting of signs at the western end of the Scheme in order to protect the WHS's OUV (see OEMP, D-CH8). Appropriate signage and infrastructure would be provided outside the WHS to manage traffic through the corridor. • Drainage proposals, including the proposed location and size of balancing ponds, are outlined in the Road Drainage Strategy [APP-281]. Paragraph 10 of Schedule 2 to the draft DCO [APP-020] requires Highways England to submit written details of the drainage system based on mitigation measures included in the Environmental Statement. • Fencing in the WHS shall be developed in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council, as secured in the Outline Environmental Management Plan (OEMP) [APP-187] (D-CH14). The main works contractor shall consult with the relevant bodies, including Historic England,

Matter Raised	Highways England's Response
	<p>to determine the type of construction boundary fencing to be used within the WHS or within the setting of WHS. The type of fencing would be sympathetic to the setting of the WHS. The OEMP is secured under paragraph 4 of Schedule 2 within the draft DCO [APP-020].</p> <ul style="list-style-type: none"> As reflected in, ES Chapter 7, Landscape and Visual [APP-045], paragraph 7.8.5, the landscape mitigation design principles in the context of the WHS included the implementation of a planting strategy to respect the objectives of the WHS Management Plan, which include to minimise new planting in or adjacent to the WHS. As such, the Scheme will focus principally on establishment of chalk grassland rather than tree planting, as set out in ES Chapter 7, Landscape and Visual [APP-045], Section 8, Table 8.5. Under requirement 8 of Schedule 2 of the DCO, Highways England will be required to submit a detailed landscaping scheme, which is required to be on the basis of the mitigation measures set out in the ES, which includes the above principles. <p>We are continuing discussion with Historic England regarding these details and they will be confirmed within a statement of common ground between the parties, to be issued to the Examination in due course. Further refinement through the detailed design process in consultation with the Historic England will take place.</p>
<p>Historic England states that, there is an absence of detailed proposals for: construction-period temporary infrastructure and reinstatement of affected land post-construction.</p>	<p>Highways England considers sufficient detail has been provided to enable Historic England to understand and comment on the proposals. Details of the construction compounds are provided in Chapter 2 [APP-040], with the proposed locations shown on the General Arrangement Drawings [APP-012], with layouts shown indicatively in ES Figure 2.7 [APP-061]. The potential impacts of the compounds and the activities associated with them would be controlled by measures to limit or avoid dust, noise, spillage and disruption by construction traffic, as set out in the Outline Environmental Management Plan (OEMP), ES Appendix 2.2 [APP-187], which is secured by paragraph 4 of Schedule 2 of the draft Development Consent Order [APP-020]. On completion, the construction compounds, and all other temporary facilities, would be removed and the land reinstated, secured through the OEMP (MW-G30). Where land is occupied temporarily for the purposes of construction, before giving up possession of the land, Highways England must restore it to the reasonable satisfaction of the owner in accordance with article 29 of the draft DCO [APP-020].</p> <p>The design of these elements will be developed further through the detailed design process in consultation with Historic England. This will be confirmed within a statement of common ground between the parties, to be issued to the Examination in due course.</p>
<p>Historic England states that there is an absence of detailed proposals for: tunnel limits of deviation: the location of the proposed western portal has been carefully considered – yet there is a proposed limit of deviation of up</p>	<p>Highways England considers sufficient detail has been provided to enable Historic England to understand and comment on the proposals. The Limits of Deviation (LoDs) set out the maximum parameters necessary to deliver the Scheme based on the information available at this stage in the process. The Environmental Statement reports on the effects of the Scheme, to the extent of the LoDs. Highways England continues to liaise with Historic England regarding the Scheme design and the points raised</p>

Matter Raised	Highways England's Response
<p>to 200m westwards, which is a significant variation in relation to the local topography.</p>	
<p>Historic England states that there is an absence of detailed proposals for: potential restriction of future archaeological research within the affected part of the WHS (e.g. above the tunnel route). This would be contrary to the provisions of the Stonehenge WHS Management Plan, reflecting obligations accepted by the UK Government in ratifying the World Heritage Convention. Restrictions on future archaeological research could have an adverse impact upon the OUV of the WHS.</p>	<p>As noted in the Statement of Reasons [APP-023], restrictions are required above the tunnel in order to secure protection of the tunnel from potentially conflicting future development and works that might jeopardise the structural integrity of the tunnel. Highways England acknowledges Historic England's concerns regarding the tunnel restriction areas and is undertaking further work to provide details of the type of restrictions required. Highways England will continue to engage with Historic England on this issue.</p>
<p>Historic England states that there is an absence of detailed proposals for: appropriateness of some of the provisions of the draft DCO (in light of the scheme traversing the WHS) to secure the protection of the historic environment and to ensure that there are mechanisms to implement and deliver the mitigation, benefits and legacy provisions and aspirations of the scheme.</p>	<p>Highways England continues to liaise with Historic England and looks forward to considering any specific points that Historic England wishes to raise in relation to the provisions of the draft DCO</p>
<p>Historic England states that there is an absence of detailed proposals for: adequacy of measures for consultation and engagement of Historic England in the Discharge of</p>	<p>Consultation with Historic England on matters pertaining to its functions is secured in two key ways. Firstly, paragraph 4 of Schedule 2 to the draft DCO [APP-020] requires Highways England to carry out the Scheme in accordance with the Outline Environmental Management Plan (OEMP) [APP-187]. The OEMP requires the contractor to develop Construction Environmental Management Plans (CEMP) for the Scheme, which must be prepared in accordance with the principles of the OEMP. The OEMP requires the preliminary</p>

Matter Raised	Highways England's Response
<p>Requirements – in light of the impact on the WHS and archaeology.</p>	<p>works CEMP to include the following for the preliminary works, in consultation with the relevant heritage bodies:</p> <ul style="list-style-type: none"> • PW-CH1 – a Heritage Management Plan; • PW-CH3 – Site Specific Written Schemes of Investigation to describe the mitigation measures that will be carried out; • PW-CH4 – Method Statements to include protective fencing for identified heritage assets and appropriate archaeological mitigation measures; • PW-CH5 – Site Specific Written Schemes of Investigation to include measures to install temporary barrier fencing to limit land disturbance at the western portal and eastern portal approaches; • PW-CH6 – Site Specific Written Schemes of Investigation to include measures to avoid significant archaeological remains where possible and implement appropriate archaeological mitigation measures where impacts are unavoidable; • PW-LAN1 –the installation of fencing to protect retained vegetation within the WHS; <p>In respect of the main works the OEMP requires the main works CEMP to include the following, in consultation with the relevant heritage bodies:</p> <ul style="list-style-type: none"> • MW-CH1 – Heritage Management Plan based on the Detailed Archaeological Mitigation Strategy (see requirement 5 of Schedule 2 to the draft DCO [APP-020]) indicating how the historic environment is to be protected in a consistent and integrated manner. • MW-CH3 - the type of construction boundary fencing to be used within the WHS or its setting and to be included in an Archaeological Method Statement forming part of a main works CEMP; • MW-CH5 - Archaeological Method Statements describing the appropriate measures to be used where potentially sensitive archaeological remains are required to be buried or sealed beneath fill material; • MW-CH6 - Site Specific Written Schemes of Investigation in respect of service/utility corridors requiring excavations, to avoid archaeological remains wherever possible and implement appropriate archaeological mitigation measures where impacts are unavoidable; • MW-CH7 requires appropriate monitoring arrangements for all heritage assets during the construction programme within the WHS. <p>Secondly, paragraph 5 of Schedule 2 to the draft DCO [APP-020] requires the Scheme to be carried out in accordance with the Detailed Archaeological Mitigation Strategy. Highways England has submitted a document that further clarifies the relationship between the Detailed Archaeological Mitigation Strategy and the OEMP [AS-010].</p>

Matter Raised	Highways England's Response
<p>Historic England states that there are also a number of points of detail within the documents submitted which raise issues of accuracy, clarity and consistency which should be resolved either in the written representations, statement of common ground or via the Applicant submitting an errata report as appropriate.</p>	<p>Highways England has not received any detail of these matters to date but thanks Historic England for its comment and welcomes any future engagement on such matters, be it through the written representation, statement of common ground, or other mechanism.</p>
<p>Historic England also note that the DCO encompasses compulsory purchase provisions which will have a bearing on Historic England landownership. The English Heritage Trust will be leading the response to this aspect</p>	<p>Your comment is noted.</p>
<p>Historic England wishes to register its interest in the examination of the A303 Amesbury to Berwick Down Road Improvement.</p>	<p>Your comment is noted, Highways England looks forward to engaging further with Historic England through the formal Examination process.</p>

23 National Trust (RR-2344)

23.1 Key issues

Table 23-1: National Trust

Matter Raised	Highways England's Response
<p>The DCO includes the need for land that is owned by the Trust to be compulsorily acquired, and as such the Trust is considered an 'affected person'. In 1907 Parliament gave the Trust a power to declare land 'inalienable', and the Trust's land at the Stonehenge landscape is today held inalienably.</p> <p>In order to build the proposed scheme, Highways England would need to compulsorily acquire National Trust inalienable land. The Trust promises to look after its special places 'for ever, for everyone'.</p>	<p>Highways England understands that the land owned by the National Trust which it is proposing to compulsorily acquire pursuant to the DCO is held inalienably.</p>
<p>The Trust also notes that the DCO includes wide powers of temporary possession which the Trust does not consider should apply to its land. The potential use of temporary possession powers over Trust land needs to be controlled and monitored to avoid adverse impacts on the WHS, including during construction. The Trust therefore expects to see these</p>	<p>The temporary possession of land would be limited to what is essential for the efficient construction of the Scheme.</p> <p>The DCO seeks powers to take temporary possession of land for constructing and maintaining the Scheme. These powers may be exercised in respect of land that is only required during the construction works, such as for compounds and the storage of materials. Where land is intended to be acquired permanently, temporary possession may initially be taken until the permanent requirements are finalised to ensure that Highways England does not permanently acquire more land than is necessary.</p> <p>It is accepted and agreed, however, that such temporary possession powers are not required at the surface</p>

Matter Raised	Highways England's Response
<p>controlled within the DCO, potentially through avoidance and appropriate protective provisions</p>	<p>over land identified for only subsoil acquisition. Highways England has offered a commitment to the Trust to confirm that no temporary possession powers would be used at the surface of plots 06-08, 06-11, 06-13, 07-02, 07-05, 07-07, 07-13, 08-02, 08-07, 08-09, 08-10, 08-11, 08-RR22, and temporary possession powers would be limited to subsoil level only.</p>
<p>At this stage the DCO documentation does not sufficiently show critical detail across a broad range of matters in relation to both design and delivery. The Trust would like to see this detail defined through the DCO, and where this is not appropriate seeks provision within the DCO to ensure the Trust is a consultee on all key aspects of the detailed design and delivery through Requirements and bespoke protective provisions.</p>	<p>The design has been fixed to an appropriate level for the DCO application. The design will be developed through the detailed design stage of the project. Highways England would like to engage with the National Trust on all relevant aspects of the detailed design and delivery of the Scheme. This will be recorded in a statement of common ground between the parties.</p>
<p>The Trust has a strong interest in the development of the key control documents within the DCO including the DAMS (Detailed Archaeological Mitigation Strategy); OWSI (Outline Written Scheme of Investigation); CEMPs (Construction Environmental Management Plan); and HEMP (Handover Environmental Management Plan). The approach defined within these documents will be key in our assessment of the scheme's suitability. As such, we expect to be closely consulted in their development. At this stage we would have expected to see the DAMS, and</p>	<p>Highways England acknowledge the National Trust's comments and note the following:</p> <ul style="list-style-type: none"> • The Detailed Archaeological Mitigation Strategy (DAMS) is being developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group (which includes the National Trust), and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order (DCO) [APP-020]; • The Overarching Written Scheme of Investigation is being prepared to accompany the DAMS (as referred to above); • The Record of Environmental Actions and Commitments (REAC) tables 3.2a and 3.2b of the Outline Environmental Management Plan (OEMP) [APP-187] and the Outline Archaeological Mitigation Strategy [APP-220] have been submitted as part of the DCO application. Highways England's appointed contractor will be required to develop and implement a detailed Construction Environmental Management Plan (CEMP), which will be based on the OEMP, as secured by paragraph 4 of Schedule 2 of the draft DCO.; and • The main works contractor will prepare a final version of the CEMP for the operational and maintenance phase of the Scheme in the form of a Handover Environmental Management Plan (HEMP). <p>A full and comprehensive programme of archaeological evaluation surveys has been completed. The completed archaeological evaluation reports have been developed in consultation with Wiltshire Council Archaeology Service and the Heritage Monitoring Advisory Group, which includes the National Trust. The National Trust has</p>

Matter Raised	Highways England's Response
<p>the completed Archaeological Evaluation Reports that support it, but to date we have not.</p>	<p>been provided with the opportunity to comment. The results of the archaeological evaluations were either considered, or confirm the survey data considered, for the submission of the ES and the HIA. The archaeological evaluation reports confirm the archaeological baseline and the approach to mitigation. These have been reviewed in line with the ES tables that detail the impacts and the significance of effects (Section 6.9 in Chapter 6 and Appendix 6.8). No additional significant effects have been identified.</p> <p>Each CEMP, including the HEMP, will be developed in consultation with the relevant stakeholders as set out in the OEMP.</p> <p>We refer the National Trust to Additional Submission 3 [AS-007] of Highways England response to the S51 Advice, which explains the relationships between and requirements of the various environmental management documents.</p>
<p>The overall Rights of Way strategy needs further consideration, especially in regards to the proposed treatment of the current A303 and the redundant portion of the A360 and other NMU (Non-Motorised User) access post scheme construction.</p>	<p>The parts of the road surface of the existing A303 and A360 within the WHS would be removed in accordance with references D-CH2 and D-CH3 of the OEMP [APP-187]. Compliance with the OEMP is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020]. The new restricted byway within the WHS would provide a durable surface for non-motorised users including those needing mobility aids, and those vehicles permitted to use the route such as agricultural and maintenance vehicles. Details, including width and surface treatment, are under discussion. The surplus areas of redundant road surface would be replaced by chalk grassland (Section 2.3.56(d) in the Environmental Statement [APP-040]).</p> <p>We are continuing discussion with National Trust regarding these details. Further refinement through the detailed design process in consultation with the National Trust will take place.</p>
<p>The status of the current BOATs (Byways Open to All Traffic) require further consideration to ensure compatibility with the overall configuration of the other forms of access and Rights of Way within the WHS post scheme construction.</p>	<p>Changing the status of the existing BOATs is beyond the scope of the Scheme and is a matter for Wiltshire Council to consider as the local highway authority. Highways England wish to ensure that the Scheme is integrated within the existing byway network and, where the opportunity exists, create legacy benefits for non-motorised users in accordance with its Strategic Business Plan and Road Investment Strategy, which are aligned with Government policy to encourage walking, cycling & horse-riding through national and local policies and plans. The new public rights of way measures proposed along the Scheme would not only maintain, but would also considerably enhance the existing PRoW network, significantly improving connectivity for non-motorised users, as illustrated on the Rights of Way and Access Plans [APP-009].</p>
<p>The Trust's initial review indicates that some of the proposed Limits of Deviation (LoDs) are a cause for</p>	<p>The Limits of Deviation (LoDs) set out the maximum parameters necessary to deliver the Scheme based on the information available at this stage in the process. The Environmental Statement [APP-039 – APP-054] and Heritage Impact Assessment (HIA) [APP-195] report on the effects of the Scheme to the extent of the LoDs.</p>

Matter Raised	Highways England's Response
<p>concern given the wide variation possible within the LoDs. The Trust has particular concerns with regards to the impacts on the OUV of the WHS landscape around both of the portal entrances. We would welcome further clarity from, and discussion with, Highways England with regards to the proposed LoDs and their implications, including any knock-on effects to other scheme elements.</p>	
<p>We are not yet convinced that the restrictions proposed above the tunnel on Trust land (as well as on adjacent land) are appropriate for a WHS where restrictions on archaeological research could adversely impact its OUV. In addition, we require further information on how the sub-surface archaeology within the area Highways England intend to purchase will be adequately protected post-construction.</p>	<p>As noted in the Statement of Reasons [APP-023], restrictions are required above the tunnel in order to secure protection of the tunnel from potentially conflicting future development and works that might jeopardise the structural integrity of the tunnel. Highways England acknowledges the National Trust's concerns regarding the tunnel restriction areas and is undertaking further work to provide details of the type of restrictions required. Highways England will continue to engage with the National Trust on this issue. Post-construction, the sub-surface archaeology will be protected, in areas Highways England intend to purchase from the National Trust, by the use of a Handover Environmental Management Plan (HEMP) and regularly updated Cultural Heritage Asset Management Plans (CHAMP).</p>
<p>There is insufficient detail in the OEMP (Outline Environmental Management Plan) to allow us to adequately assess if the approach to mitigation, establishment methodology, and subsequent management is wholly suitable. In some cases we have identified areas where proposals should be strengthened, for example mitigation for European Protected Species at the</p>	<p>Adequacy of OEMP and Assessment</p> <p>The Outline Environmental Management Plan (OEMP) [APP-187] contains sufficient detail with which to assess whether mitigation is suitable. The assessment, including the proposed mitigation, is in accordance with industry guidance and best practice, including Ecological Impact Assessment guidelines published by the Chartered Institute of Ecology and Environmental Management (CIEEM) and Guidance provided in Highways England's IAN 130/10, which is a component part of the DMRB, as set out in ES Chapter 8, Biodiversity [APP-046], Section 8.3, Assessment Methodology.</p> <p><u>OEMP, CEMP (LEMP and HEMP)</u></p> <p>We refer National Trust to Additional Submission 3 [AS-007] of Highways England response to the S51 Advice, which explains the relationships between and requirements of the various environmental management</p>

Matter Raised	Highways England's Response
<p>Countess flyover, and the potential for improved east-west ecological connectivity.</p> <p>We also seek further clarity on the interrelationship of, and how information will transfer through, the OEMP to the CEMP, and to the LEMP (Landscape & Ecology Management Plan) and HEMP.</p>	<p>documents.</p> <p>As explained and illustrated in the above referenced Additional Submission, the OEMP is the basis from which detailed, works-specific, CEMPs will be prepared by the relevant contractors, as is required by the OEMP itself and therefore secured through paragraph 4 of Schedule 2 of the draft Development Consent Order [APP-020]. The OEMP sets out the requirement for the main works contractor to prepare a Landscape and Ecology Management Plan (LEMP) (MW-LAN1), in accordance with industry good practice, as well as a Landscaping Scheme (under paragraph 8 of schedule 2 of the draft Development Consent Order [APP-020]). The main works contractor will prepare a final version of the CEMP for the operational and maintenance phase of the Scheme in the form of a Handover Environmental Management Plan (HEMP) (required by the OEMP to be based on the CEMP and the LEMP in effect at the time). Each CEMP, including the LEMP, HEMP and any other accompanying method statements, will be developed in consultation with the relevant stakeholders as set out in the OEMP.</p> <p><u>Protected Species (Bats)</u></p> <p>Regarding European Protected Species, it is understood that the National Trust is referring to bats. The assessment of the potential for impact on bats, including on roosts and crossing points, is set out in ES Chapter 8, Biodiversity [APP-046]. The results of the bat crossing point surveys are presented in detail in ES Appendix 8.18, Bat crossing point survey report [APP-259].</p> <p>During the six hours of survey undertaken at the Countess Roundabout during the targeted Crossing Point Surveys, a total of six bats were recorded crossing the A303 (four traveling from north to south, two commuting from south to north). Five of the bats recorded were soprano pipistrelle <i>Pipistrellus pygmaeus</i>. A further two bats (undefined pipistrelle and a soprano pipistrelle) were recorded crossing the A465 to the south of the Countess roundabout where the A465 bisects the River Avon.</p> <p>The surveys indicate that a very small proportion of bats that are crossing the A303 are doing so at Countess flyover. The majority of bats recorded crossing the A303 (north or south) were recorded to be using the River Avon / A303 bridge (17 bats were confirmed crossing underneath the bridge). It should be noted that due to the high levels of bat foraging activity under the bridge, the number of bats crossing at this point, is likely to be significantly higher. As this bridge is being retained, fragmentation impacts associated with Countess Flyover are not significant.</p> <p>The proposed planting and inclusion of a noise barrier around the flyover, is likely to provide a secondary function of pushing up any bats flying over the A303 to 'safe' heights, or assist in funnelling bats through the large underpasses.</p>

Matter Raised	Highways England's Response
	<p><u>East-West Connectivity</u></p> <p>Improved east-west connectivity could be achieved with the implementation of the replacement planting, as proposed by the National Trust, located within the National Trust soft estate on the north side of the A303 at Countess Farm. However, this is not required as essential mitigation for vegetation loss or habitat fragmentation and would be for enhancement purpose only, hence is proposed to be progressed by agreement with the National Trust. Highways England welcomes further discussion on this matter.</p>
<p>There is potential for significant landscape, visual, noise and vibration impact at Countess Farm and we require further information to be satisfied that the proposed mitigation measures fully address these issues.</p>	<p><u>Landscape and visual</u></p> <p>The Landscape and Visual Impact Assessment has identified a significant visual effect at Countess Farm due to the height of the viaduct and associated vehicles above the intervening vegetation, as reported in ES Chapter 7 [APP-045], Section 7.9. This is supported by visualisations of the Countess Flyover to aid in understanding the scale of the proposal, ES Figures [APP-145] and [APP-146].</p> <p>The mitigation for this significant visual effect is set out in ES Section 7.8, including Table 7.5 [APP-045], and shown indicatively on the Environmental Masterplan [APP-059]. It includes new planting within the highway's boundary and will be included in the landscaping scheme to be implemented pursuant to paragraph 8 of Schedule 2 to the draft DCO [APP-020]. The mitigation will reduce the significance of the effect from major adverse to moderate adverse by year 15 of operation, however, as the flyover would still be visible at and beyond this time, the moderate adverse effect will remain.</p> <p>The matter of off-site planting at Countess Farm is currently under discussion between Highways England and the National Trust.</p> <p><u>Noise and vibration</u></p> <p>With regard to operational traffic noise, mitigation measures have been included in the design via the use of a thin surfacing system for the road surface, which results in lower levels of noise generation than a standard hot rolled asphalt surface, and 1.8m noise barriers on the flyover, as secured through the Outline Environmental Management Plan (OEMP) [APP- 187], (D-NOI1 and D-NOI2). The OEMP is secured through paragraph 4 of schedule 2 of the draft Development Consent Order [APP-020]. With these measures in place the magnitude of the increase in traffic noise at Countess Farm is negligible (less than 1dB), as set out in ES Chapter 9, Noise and Vibration [APP-047], Table 9.24 (Countess Farm is included in the row "<i>Remainder of receptors in study area, including majority of residential buildings and non-residential receptors in Amesbury</i>").</p>

Matter Raised	Highways England's Response
	<p>During construction, a significant adverse daytime noise effect is anticipated for short periods of time during some of the works, as summarised in ES Chapter 9, table 9.25. Road construction works using vibratory rollers will be required in the vicinity of the Countess Farm, however the predicted vibration levels do not exceed the criteria to be classed as a significant adverse effect, as set out in ES Chapter 9, paragraphs 9.9.14 – 9.9.23, and summarised in Table 9.15. The contractor would be required to prepare a Construction Environmental Management Plan (CEMP), including a specific Noise and Vibration Management Plan, which will be based on the OEMP [APP-187] and will include a range of construction noise and vibration mitigation measures which would be adopted during the works (MW-NOI1: Best Practicable Means MW-NOI2: Section 61 Consents, MW-NOI3: Noise and Vibration Management Plan, MW-NOI4: Noise Insulation and Temporary Re-Housing, MW-NOI5: Vibration, and MW-NOI6: Monitoring of Noise and Vibration). In producing the CEMP, the contractor will be required to consult with Wiltshire County Council.</p>
<p>Further clarity is needed around the types and frequency of activities which will need to be carried out once the proposed scheme is operational, how the impact of this activity will be assessed and how the Trust will interact with Highways England and their agents in this regard.</p>	<p>The operation of the Scheme, including, for example, the use of the Scheme by road users and the operational plant within the tunnel, is assessed through the EIA, as reported in ES Chapters 5 to 16 [APP-043 – APP-053]. As set out in the Outline Environmental Management Plan (OEMP) [APP-187], which is secured through paragraph 4 of Schedule2 of the draft Development Consent Order [APP-020], the main works contractor will be required to prepare a Handover Environmental Management Plan (HEMP) (MW-G11). The HEMP will provide the relevant information on existing and future environmental commitments and objectives that would need to be honoured and define on-going actions and risks that need to be managed. As with the physical design of the Scheme, details of operational activities will be developed through the detailed design process. Where relevant to interests of the National Trust, the details will be developed in consultation with the National Trust. This will be confirmed within a statement of common ground between the parties, to be issued to the Examination in due course.</p>
<p>There are a number of discrepancies, inconsistencies and areas in need of further clarification. We expect Highways England to address these where appropriate by means of addendums.</p>	<p>Highways England will liaise with the National Trust and any discrepancies or inconsistencies will be addressed as appropriate during Examination.</p>
<p>At this stage, the Trust objects to the acquisition of this [the land owned by the Trust and held inalienably] land on the grounds of the issues raised in this Relevant Representation, and to be raised further in the examination</p>	<p>Highways England will continue to work with the National Trust to understand and address its outstanding concerns and work towards the removal of the National Trust's objection. Highways England has set out in the Statement of Reasons [APP-023] why the land owned by the National Trust is required and that there is a compelling case in the public interest for this land to be compulsorily acquired.</p>

Matter Raised	Highways England's Response
<p>process. These issues represent significant reasons why land held by the Trust for the benefit of the nation should not be released for the purposes of the scheme until they are adequately resolved to the Trust's satisfaction, and solutions secured in the final form of any confirmed DCO documentation.</p>	
<p>We seek further provisions to be made within the DCO, and for Highways England (and its contractors) to work with and consult with the Trust (and other key stakeholders) in a meaningful way through the entire life of the project, and post construction.</p>	<p>Highways England welcomes ongoing engagement and is in discussion with the National Trust on the most appropriate means of achieving this. This will be recorded in a statement of common ground between the parties.</p>
<p>The Trust will not part with its land held inalienably unless we are completely satisfied that the proposals are, in all the circumstances, appropriate. We are objecting at this stage to the purchase of National Trust land held inalienably in order to ensure the best possible outcome for the WHS is secured. In due course, if we are convinced that the scheme addresses the issues and concerns we are raising, and offers the level of protection we have pressed for throughout, we will be in a position to remove our objection.</p>	<p>Highways England will continue to work with the National Trust to understand and address its outstanding concerns and work towards the removal of the National Trust's objection.</p>

Matter Raised	Highways England's Response
<p>The Trust welcomes the progress made by Highways England to date, and considers that the proposed scheme has the potential to be acceptable and deliver tangible benefits to the WHS. However, we will only support the progression of a scheme which we are sure protects the OUV of the WHS. Given the unique and internationally significant nature of the landscape, we do not consider that the DCO submission from Highways England currently provides the level of detail required for us to be confident that the approach to design and delivery of the scheme will achieve this essential goal. In addition, there are some areas of the current design approach that we disagree with, as well as important areas of methodology that are yet to be defined.</p>	<p>Highways England continues to work with the National Trust to understand its outstanding concerns.</p> <p>A comprehensive Heritage Impact Assessment has been prepared following ICOMOS guidelines (https://www.icomos.org/world_heritage/HIA_20110201.pdf). The scope and approach of this assessment, which is reported in ES Appendix 6.1 [APP-195], was endorsed by UNESCO/ICOMOS in their report from their third advisory mission on the Scheme early in 2018 (https://whc.unesco.org/en/list/373/documents/), and developed in consultation with the relevant bodies, including National Trust. The Applicant considers that the HIA has been carried out accurately and with a full appreciation and understanding of the importance of the WHS and its OUV. Overall, the Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole and the OUV of the WHS would be sustained. Further information can be found in the ES Chapter 6, Cultural Heritage [APP-044] and ES Appendix 6.1, Heritage Impact Assessment [APP-195].</p> <p>The design will be developed through the detailed design stage of the project. Highways England would like to engage with the National Trust on all relevant aspects of the detailed design and delivery of the Scheme.</p>

24 Natural England (RR-2253)

24.1 Key issues

Table 24-1: Natural England

Matter Raised	Highways England's Response
Overall views, and more detailed comments, relating to the biodiversity impacts of the scheme, including in relation to the Habitats regulation assessment, together with general and specific observations around the design of the scheme.	Thank you for your representation. A Statement of Common Ground (SoCG) is currently being developed between Highways England and the Natural England covering the issues set out in Natural England's Relevant Representation, to be issued to the Examination in due course.

25 Winterbourne Stoke Parish Council (RR-1400)

25.1 Key issues

Table 25-1: Winterbourne Stoke Parish Council

Matter Raised	Highways England's Response
<p>The need for a safe north-south crossing of the A303 at the western end of the scheme at Yarnbury Castle.</p>	<p>No crossing is proposed as part of this Scheme. While the opening in the central reservation would remain open for users, the Scheme would provide a safe means of crossing for non-motorised users at Green Bridge No. 1, albeit at additional length for north-south non-motorised users of the SLAN3 byway. The location of these changes is shown in the Rights of Way and Access Plans [APP-009].</p> <p>Highways England will keep under consideration whether there is a need for other measures at this location separately from this Scheme.</p>
<p>The undesirability and lack of credible justification for Green Bridge No 1.</p>	<p>Green Bridge No. 1, in the location and design proposed through the DCO, is essential mitigation. The green bridges on the Scheme perform a number of functions. In the case of Green Bridge No. 1, it would maintain agricultural access and accommodate a new restricted byway (a route that is preferred because the alternative via the B3083 would be a 1.3km longer detour for users of Byway SLAN3 seeking to cross the A303 and avoid the existing crossing at Yarnbury), which continues along the north side of the new road westwards to connect with the existing byway SLAN3, providing a safe crossing of the A303 for walkers, cyclists and horse riders. In addition, the landscaped green bridge would aid the integration of the Scheme into the landscape and improve ecological connectivity for a range of species, enhancing opportunities for dispersal out of the Parsonage Down SSSI.</p> <p>Highways England has provided further justification to the Parish Council in the form of a detailed technical note. Highways England will continue to engage with the Parish Council through the Examination process to work towards the removal of their concerns in relation to this element of the Scheme.</p>
<p>The need for both sound and visual barriers on the southern side of the Till viaduct and the need for visual</p>	<p>Assessments have shown that there is no justification for providing noise screens on the viaduct. The results of the traffic noise modelling and assessment are presented in ES Chapter 9, Noise and Vibration [APP-047]. The expected changes in traffic noise levels as a result of the Scheme are illustrated in the noise contour plans</p>

Matter Raised	Highways England's Response
barriers to be much higher than the proposed 1.5 metres.	<p>accompanying the ES, Figures 9.4 [APP-167] and 9.5 [APP-168].</p> <p>However, a 1.5 metre high barrier is proposed along the south side as a visual screen, as secured through the Outline Environmental Management Plan (OEMP) (D-LAN2), which is secured through paragraph 4 of schedule 2 of the draft Development Consent Order [APP-020]. A screen of 1.5m is considered to be the best balance between providing a degree of visual screening of vehicles and their headlights, whilst limiting the visual mass of the viaduct as perceived in views from Winterbourne Stoke. If the screen were any higher it would risk becoming an overtly un-aesthetic feature, requiring additional engineering to the viaduct to support it, and contrary to the design aim of positioning the viaduct as low as possible in the valley, without compromising the ecology across the valley floor.</p>
The need to convert the route of the existing A303 to the west of Winterbourne Stoke to a gated restricted byway, to allow limited controlled farm access and to restrict potential criminality.	Highways England will continue to engage with the Parish Council through the Examination process to work towards the removal of their concerns in relation to this element of the Scheme.
The need for removal of the existing layby to the west of Winterbourne Stoke to minimise its attraction to the travelling community and to restrict opportunities for criminality (eg. hare coursing and fly tipping).	Highways England confirms that the Scheme does not propose the closure of the layby, shown on sheet 3 of the Rights of Way and Access Plans [APP-009]. However, it is proposed that this layby be filled, profiled, soiled and seeded, to discourage vehicular use. This has been agreed with Wiltshire Council.
The need to reroute the proposed cycleway and footpath to the east of Winterbourne Stoke from the north side of the A303 to the south side.	Options north and south of the existing A303 were considered as part of the Scheme development. The northern alternative was selected as it avoids adverse impact on the wooded area on the south side of the road as it climbs eastwards out of Winterbourne Stoke. Highways England will continue to engage with the Parish Council through the Examination process to work towards the removal of their concerns in relation to this element of the Scheme.
The need for a green bridge crossing of the A360 near its junction with the new route of the A303 at Longbarrow, instead of the proposed light-controlled crossing for equines,	Safe crossings for pedestrians, cyclists and equestrians at Longbarrow junction would be facilitated through the use of crossings. It is considered that the proposed NMU crossing is appropriate and proportionate. Crossings can be accommodated safely without the cost of an additional green bridge, which would constitute a visual intrusion on the landscape as it would need to be suitably raised above the A360 to provide the necessary clearance, with the potential therefore of introducing new or changed adverse landscape and visual impacts on

Matter Raised	Highways England's Response
cyclists and pedestrians, as a critical safety measure.	the border of the World Heritage Site. Therefore, the proposed design is considered to be the optimum layout.
The need to ensure that Highways England have sought the appropriate scientific and health advice regarding the inhalation risks posed by radiation from particulate alpha emitters found in any phosphatic chalk excavated from the proposed tunnel.	<p>Excavated phosphatic chalk could give rise to emissions of radon gas, which in an outside environment would disperse rapidly, posing no risk to health. Within the enclosed environment of the tunnel boring, the health of construction personnel would be protected by the mitigation measures set out in the OEMP, which include monitoring and the development of a ventilation strategy (MW-GEO5, MW-GEO10, MW-AIR3). The OEMP is secured through paragraph 4 of schedule 2 of the draft Development Consent Order [APP-020]. Further information on the phosphatic chalk and radon gas can be found in the ES Chapter 10, Geology and Soils [APP-048].</p> <p>We have engaged Public Health England to undertake independent testing, the results of which will be submitted to the Examination in due course.</p>

26 National Farmers Union (RR-2252)

26.1 Key issues

Table 26-1: National Farmers Union

Matter Raised	Highways England's Response
<p>The DCO will contain powers to acquire compulsorily so much of the Order land as is required for the authorised development, or to facilitate, or is incidental to it. Further, the guidance as to negotiations either before or parallel with formal processes may well give rise to a <i>"legitimate expectation"</i> that such will occur, and a failure to conduct such negotiations deprives landowners of the benefit that negotiations may have brought, especially in relation to where different locations and lesser rights might have been achieved. The NFU and the land agents acting believe that no meaningful negotiations have taken place alongside the formal procedures for compulsory purchase. Therefore, a compelling case cannot be made.</p>	<p>Highways England has engaged with all affected landowners and occupiers with a view to acquiring their land interest by agreement by writing to them to inform them of Highways England's willingness to negotiate to acquire the Land by agreement, and to invite dialogue on this point. As a result, Highways England is in the process of engaging with all affected landowners with regard to the acquisition of land by agreement; and negotiations with this objective will be ongoing throughout the DCO process. The current status of such negotiations is set out in Annex B of 4-1 Statement of Reasons [APP-023]. Highways England is aware of the requirement (paragraph 25 of the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land' (DCLG, September 2013)) to seek to acquire land by negotiation wherever practicable. The power to acquire land compulsorily should only be sought if attempts to acquire by agreement fail. Further information on Highways England's case for compulsory acquisition including in respect of negotiations can be found within the Statement of Reasons, see in particular section 5 regarding the Case for compulsory acquisition and section 5.7 which relates to acquisition by agreement.</p> <p>Highways England is satisfied that the condition in section 122(3) of the PA 2008 is met and that there is a compelling case in the public interest for compulsory acquisition.</p>
<p>The two largest compound sites 05 - 07 and 05 -15 (BoR Plots) have been highlighted under Schedule 4 <i>"Land in which only New Rights ETC May Be Acquired"</i> and the description only</p>	<p>The rights associated with Plots 05-07 and 05-15 are required for the installation, use, protection and maintenance of, and access to, statutory undertakers' apparatus (for the benefit of the relevant statutory undertaker and for the Applicant); and the provision, maintenance and retention of ecological or landscape mitigation including re-profiling.</p> <p>Details of the construction compounds, including the compounds in which the slurry treatment plant would be</p>

Matter Raised	Highways England's Response
<p>highlights the purpose for which rights over land may be acquired or restrictive covenants may be imposed.</p> <p>There is no description referring to the treatment of waste soil.</p>	<p>placed, are provided in ES Chapter 2, The Proposed Scheme [APP-040], with the locations shown on the General Arrangement Drawings [APP-012] and indicative layouts shown in ES Figure 2.7 [APP-061]. The process for the management of the tunnel slurry is set out in ES Chapter 2, The Proposed Scheme [APP-040], paragraphs 2.4.51 – 2.4.56. Other excavated materials, for example from cuttings, will be managed in accordance with a Soils Management Strategy, which will include a Soils Handling Strategy and a Soil Resources Plan, as secured through the Outline Environmental Management Plan (OEMP), ES Appendix 2.2 [APP-187] (MW-GEO3 and MW-GEO7). The potential impacts of the compounds and the activities associated with them would be controlled by measures to limit or avoid dust, noise, spillage and disruption by construction traffic, as set out in the OEMP. The OEMP is secured by paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020].</p>
<p>The NFU would like to see the description of works being explicitly detailed for each compound under Schedule 4 and 7 of the DCO.</p>	<p>Details of the construction compounds, including the compounds in which the slurry treatment plant would be placed, are provided in ES Chapter 2, The Proposed Scheme [APP-040], with the locations shown on the General Arrangement Drawings [APP-012] and indicative layouts shown in ES Figure 2.7 [APP-061]. The potential impacts of the compounds and the activities associated with them would be controlled by measures to limit or avoid dust, noise, spillage and disruption by construction traffic, as set out in the OEMP [APP-187], which is secured by paragraph 4 of Schedule 2 to the draft Development Consent Order (DCO) [APP-020].</p> <p>The explicit detail of works being undertaken at each compound site, as well as the exact layout of the compounds, would be developed by the appointed main works contractor during detailed design. The main works contractor would also be required, as per paragraph 4 of Schedule 2 of the draft DCO, to develop a detailed Construction Environmental Management Plan (CEMP), which will be based on the OEMP.</p>
<p>It has been stated by Highways England that fences will be erected along the new proposed public rights of way. Whose responsibility will it be to maintain these fences in the future? It should not fall to the landowner.</p>	<p>Fences along public rights of way would be provided to prevent access onto private land, grazed grassland or the highway. Once the standard of construction is agreed between landowners and Highways England and the boundary is in place, the maintenance of these would be passed to the landowner or Wiltshire Council. This would be agreed on a case by case basis, subject to the requirements related to the land use (arable, grazed etc). Fencing provided within the Accommodation Works agreements would be of benefit to the landowner's use and therefore responsibility would lie with them.</p>
<p>Land should also not be acquired for soil re-profiling either side of the new tunnel</p>	<p>The land around the tunnel has been identified as permanent acquisition required for essential landscape integration mitigation and would be seeded with chalk-grassland, as set out in ES Chapter 7, Landscape and Visual [APP-045], Section 7.8, and Table 7.5. The principles of creation and management of this land are set out in the Outline Landscape and Ecology Management Plan (OLEMP) [APP-267]. Under paragraph 8 of Schedule 2 of the DCO, Highways England will be required to submit for approval a detailed landscaping scheme to the Secretary of State, which is required to be on the basis of the mitigation measures set out in the</p>

Matter Raised	Highways England's Response
	ES, which includes the OLEMP.
<p>No information has been found within the Outline Environmental Management Plan on how field drainage will be reinstated as part of the DCO application. Highways England need to address this issue and agree to general terms of how field drainage should be treated.</p>	<p>Field drainage systems and overland flows from catchments adjacent to the highway boundary would be intercepted and picked up by the Scheme's drainage proposals. The approach to drainage is set out in the Road Drainage Strategy, ES Appendix 11.3 [APP-281]. The potential for the Scheme to impact on existing drainage is assessed in ES Chapter 11, Road Drainage and Water Environment [APP-049]. There would be no adverse impacts on land drainage as a result of the Scheme.</p>
<p>No details have been provided to landowners and occupiers on how any increase in surface run off of water from the new road, the haul road or the construction compounds will be dealt with during construction. Therefore, there is concern that retained land may flood during the construction works.</p>	<p>A specific provision for the management of construction site drainage, including in relation to flood risk, is provided in the Outline Environmental Management Plan (OEMP) [APP-187]: full details are set out in provision MW-WAT3. The OEMP is secured by paragraph 4 of Schedule 2 of the draft Development Consent Order (DCO) [APP-020]. As set out in ES Chapter 11, Road Drainage and the Water Environment [APP-049], the assessment shows there would be no increase in flood risk during the construction, ES Section 11.9, paragraph 11.9.8.</p>
<p>Liaison with landowners, tenants and agents is highlighted in the Outline Environmental Management Plan on page 65 but this is not adequate. The NFU would like to see that the main works contractors will have to employ an agricultural liaison officer to carry out liaison with landowners.</p>	<p>An agricultural liaison function would be provided through the Communities Relationship Manager (CRM). This role, among other things, would be to liaise with the Project Manager and Environmental Manager on landowner and community concerns relating to the works and act as the main interface with these stakeholders, as set out in the Outline Environmental Management Plan [APP-187], Table 2.1. The OEMP is secured by paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020].</p>
<p>Insufficient detail has been provided as to how landowners and tenants are to access land severed by the construction works and as to whether landowners will be able to access the haul road during construction. It is</p>	<p>Highways England is currently engaging with landowners directly to discuss access arrangements. However, at this stage of the project it is not possible to agree the specifics of access arrangements, as these will come through detailed design. As set out in the Outline Environmental Management Plan [APP-187] at PW-COM1, the main works contractor would be required to advise landowners regarding the intended commencement of relevant construction works and liaise with them regarding the provision of access routes. There would be no access onto the haul road. Designated crossing points would be provided where necessary, but no use of the</p>

Matter Raised	Highways England's Response
stated in the Outline Environmental Management Plan on page 65 that the main contractors will liaise in regard to access routes but greater clarification is needed on this from Highways England.	haul road would be permitted. The OEMP is secured by paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020].
In particular there is an issue for one farm business that requires permanent access to Countess Road and, as yet, this has not been resolved with Highways England.	This matter is currently under discussion with the landowner. If an agreement to the severed land parcel cannot be found, then the landowner/occupier/agent, as appropriate, would have a right to claim compensation.

27 RSPB (RR-0587)

27.1 Key Issues

Table 27-1: RSPB

Matter Raised	Highways England's Response
Any representation made will be with regard to the statement of common ground to be drawn up between the RSPB and Highways England	Thank you for your representation. A Statement of Common Ground (SoCG) is currently being developed between Highways England and the Royal Society for the Protection of Birds (RSPB), to be issued to the Examination in due course.

Appendices

Appendix A – List of Relevant Representations Reference Numbers

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0001	Ann Jessop	
RR-0002	Anne Ryan	
RR-0003	Bill Riley	
RR-0004	Christopher David	
RR-0005	Christopher Evans	
RR-0006	David Hassett	
RR-0007	Edith Rogerson	
RR-0008	Elizabeth Forbes	
RR-0009	Elizabeth Hart	
RR-0010	Harry Shearer	
RR-0011	Henry Spender	
RR-0012	John Camp	
RR-0013	Jonathan Baker	
RR-0014	Louise Sneyd	
RR-0015	Martin McCann	
RR-0016	Mrs Georgina Hawkes	
RR-0017	Nik Marvin	
RR-0018	Pippa Richardson	
RR-0019	Robin Horton	
RR-0020	Ron Russell	Rocky Mountain Research Institute
RR-0021	Simon Banton	
RR-0022	Simon Howard	
RR-0023	Janice Hassett	STAG: Stonehenge Traffic Action Group
RR-0024	Tony Goodenough	
RR-0025	Trevor Marshall	
RR-0026	Angela Roden	
RR-0027	Carly Bannister	
RR-0028	Caroline Hoyes	
RR-0029	John Adams OBE	
RR-0030	Nicholas Aleksander	
RR-0031	James Robertson RSA FRCP	Royal Society of Arts
RR-0032	T W C Collins	
RR-0033	Neil Macdougall	Berwick St James Parish
RR-0034	Chris Todd	
RR-0035	Julia Crook	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0036	Robin Parsons	
RR-0037	Susan Grant	Stonehenge Campsite Ltd
RR-0038	Alex Coppock-Bunce	
RR-0039	Alex Johnston	
RR-0040	Alice Bouilliez	
RR-0041	Alison Fearn	
RR-0042	Alison Storer	
RR-0043	Andrew Collier	
RR-0044	Andy Eglen	
RR-0045	Andy Ludbrook	
RR-0046	Angela Britten	
RR-0047	Angela Oakes	
RR-0048	Ann Pointing	
RR-0049	Anna Pinguey	
RR-0050	Anne D Wilson	
RR-0051	Anne Dunn	
RR-0052	Anne Wichmann	
RR-0053	Anthony Conder	
RR-0054	Anthony Lamb	
RR-0055	April Claridge-Elstob	
RR-0056	Arto Keklikian	
RR-0057	Barbara Wilkinson	
RR-0058	Barry Tyler	
RR-0059	Ben Davey	
RR-0060	Bibi Freeman	
RR-0061	Bill Day	
RR-0062	Birgitta Fletcher-Tomenius	
RR-0063	Bob Swan	
RR-0064	Bradley Dale Swinderman	
RR-0065	Brenda Dimpleby	
RR-0066	Brian John Crowe	
RR-0067	C I King	
RR-0068	Carole Green	
RR-0069	Caroline Moor	
RR-0070	Caroline Sharp	
RR-0071	Ceryn Bartley	
RR-0072	Charles J Vickers	
RR-0073	Charles Singer	
RR-0074	Chasity Hungerford	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0075	Chris Barber	
RR-0076	Chris Beal	
RR-0077	Chris Jones-Jenkins	
RR-0078	Chris Pagan	
RR-0079	Christine Carlton	
RR-0080	Christine Edwards	
RR-0081	Christopher Clark	
RR-0082	Christopher Dequincey	
RR-0083	Christopher Porter	
RR-0084	Stephen Fry	Cityvoice.co
RR-0085	Claire HC Keohane	
RR-0086	Claire Maycock	
RR-0087	Claire Slater	
RR-0088	Clare McGann	
RR-0089	Clifford Clarke	
RR-0090	Colin J Todd	
RR-0091	Colin Lingard	
RR-0092	Crispin Horsfield	
RR-0093	Cyril Andrews	
RR-0094	Danu Forest	
RR-0095	David Beacham	
RR-0096	David Church	
RR-0097	David George	
RR-0098	David Gordon	
RR-0099	David Howes	
RR-0100	David Perrow	
RR-0101	Debbie Ayres	
RR-0102	Deborah Dudman	
RR-0103	Debra Guphill	
RR-0104	Dee Toth-Jones	
RR-0105	Hannah Clark	Devon County Council
RR-0106	Diane Wood	
RR-0107	Dr Angela Blaen	
RR-0108	Dr Barbara Weavers	
RR-0109	Dr David S Flynn	
RR-0110	Dr Edward Livings	
RR-0111	Dr Glyn Banks	
RR-0112	Dr Graeme Davis	
RR-0113	Dr Nicola Hall	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0114	Dr Peter Michael Simmons	
RR-0115	Dr Rob Donovan	
RR-0116	Dr. Barbara Brays Shay	
RR-0117	Duncan Tait	
RR-0118	Dylan Jones	
RR-0119	Edward Marks	
RR-0120	Eileen Wright	
RR-0121	Elaine Nuelle	
RR-0122	Elizabeth Anne Rhodes	
RR-0123	Elizabeth Armstrong	
RR-0124	Elizabeth Connor	
RR-0125	Elizabeth Cook	
RR-0126	Ellen Portess	
RR-0127	Erica Gregory	
RR-0128	Fiona Frank	
RR-0129	Fiona Marlow	
RR-0130	Fiona Marshall	
RR-0131	Fleur Oakes	
RR-0132	Gabby Taylor	
RR-0133	Gareth Davies	
RR-0134	Geoffrey Grey	
RR-0135	Georgina McHugh	
RR-0136	Gillian Bates	
RR-0137	Gillian Miller	
RR-0138	Gloria Smith	
RR-0139	Paul Walker	Go South Coast
RR-0140	Graham Avory	
RR-0141	Graham Fyffe	
RR-0142	Graham Trickey	
RR-0143	Hannah Berry	
RR-0144	Harold Ewald	
RR-0145	Harry Lewis	
RR-0146	Hazel Holmes-Wilde	
RR-0147	Helen Coulson	
RR-0148	Helen M Barton	
RR-0149	Hugh Whiffen	
RR-0150	Ian Cunningham	
RR-0151	Ian Frolic	
RR-0152	Ian Scrimgeour	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0153	Imogen May	
RR-0154	Jack Hanbury	
RR-0155	James Burden	
RR-0156	James Button	
RR-0157	James Flinders	
RR-0158	James McAndrew	
RR-0159	James Roberts	
RR-0160	James Thomas	
RR-0161	Jane McCullen	
RR-0162	Jane Walker	
RR-0163	Janet Marks	
RR-0164	Janet Prior	
RR-0165	Jaqueline Turner	
RR-0166	Jasper Selwyn	
RR-0167	Jay Foote	
RR-0168	Jayne Cooper	
RR-0169	Jeff Evans	
RR-0170	Jeff Piper	
RR-0171	Jenny Grey	
RR-0172	Jill Hallett	
RR-0173	Jo Lockyer	
RR-0174	Joanna Burnett	
RR-0175	John B Davies	
RR-0176	John Bulwer	
RR-0177	John Clarke	
RR-0178	John Dolan	
RR-0179	John Murphy	
RR-0180	John Parrott	
RR-0181	John Smith-Warren	
RR-0182	Jonathan Burrows	
RR-0183	Joseph Nicholas	
RR-0184	Judith Bruni	
RR-0185	Judith Hible	
RR-0186	Julian Glyn-Owen	
RR-0187	Julian Hilton	
RR-0188	Julie Gillam	
RR-0189	Julie Gregory	
RR-0190	Julie Moon	
RR-0191	Julie OMalet	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0192	Karen Gentleman	
RR-0193	Karen Hanson	
RR-0194	Kathleen Friday	
RR-0195	Kathy Mingo	
RR-0196	Keith Harcourt	
RR-0197	Keith Moore	
RR-0198	Ken Simpson	
RR-0199	Kenneth Brewer	
RR-0200	Keren Burney	
RR-0201	Kerry Holmes	
RR-0202	Kevin Coombes	
RR-0203	Kim Mosey	
RR-0204	L Paterson	
RR-0205	Lea Anderson	
RR-0206	Lee Rose-Parsfield	
RR-0207	Leonard H W Van Sandick	
RR-0208	Linda Henderson	
RR-0209	Linda Holmes	
RR-0210	Linda Matthews	
RR-0211	Lisabeth Lee Ryder	
RR-0212	Liz Dore	
RR-0213	Lord Kennet	
RR-0214	Lorren Boniface	
RR-0215	Lotus Moran	
RR-0216	Louisa Young	
RR-0217	Louise Burton	
RR-0218	Louise Cotulla	
RR-0219	Lynda Raine	
RR-0220	Lynn Carter	
RR-0221	Lynn Macaskill	
RR-0222	Madelaine Watkins	
RR-0223	Marc Thorne	
RR-0224	Margaret Millgate	
RR-0225	Maria Koval	
RR-0226	Mark A Jenkins	
RR-0227	Mark Barnett	
RR-0228	Mark Brookes	
RR-0229	Mark Jones	
RR-0230	Martin Kilbey	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0231	Martin Southwood	
RR-0232	Martin Whillock	
RR-0233	Matthew Chart	
RR-0234	Maxine Symons	
RR-0235	Megan Hitchens	
RR-0236	Melanie Roxby-Mackey	
RR-0237	Michael Brown	
RR-0238	Michael Hudson	
RR-0239	Michael Owen	
RR-0240	Michael Sackin	
RR-0241	Michael Smith	
RR-0242	Mike Efstathiou	
RR-0243	Miss L V Jones	
RR-0244	Mr J Simpson	
RR-0245	Mr Peter J.Higgs	
RR-0246	Mr Roy Park	
RR-0247	Mr Stephen R Pugh	
RR-0248	Mrs Catharine Sharples	
RR-0249	Mrs Charmaigne Jones	
RR-0250	Mrs Crowther	
RR-0251	Mrs Freya Buchanan-Januskevic	
RR-0252	Mrs Lesley Kahney	
RR-0253	Mrs. Patricia Williamson	
RR-0254	N J Dearden	
RR-0255	Neil Rhoods	
RR-0256	Nick Beeton	
RR-0257	Nick Gilbert	
RR-0258	Nick Middleton	
RR-0259	Nick Orson	
RR-0260	Nick Stedman	
RR-0261	Nicola Baker	
RR-0262	Nigel Linge	
RR-0263	Norman Cesar	
RR-0264	Paige Thompson	
RR-0265	Pam Jones	
RR-0266	Pam Rouquette	
RR-0267	Pamela Marchant	
RR-0268	Pat Snelling	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0269	Pat Thorne	
RR-0270	Patricia Dawkins	
RR-0271	Paul Fletcher-Tomenius	
RR-0272	Paul McKernan	
RR-0273	Paul Reddy	
RR-0274	Paul Watson	
RR-0275	Peter Croft	
RR-0276	Peter Garner	
RR-0277	Peter John Daymond-King	
RR-0278	Peter Jones	
RR-0279	Peter Trigg	
RR-0280	Philip Hurd-Wood	
RR-0281	Philippa Stout	
RR-0282	Phillip Lacey	
RR-0283	Phillip Shukman	
RR-0284	Pipaluk Frederiksen	
RR-0285	Poppy Fee	
RR-0286	Quentin Given	
RR-0287	Rachel Stevens	
RR-0288	Rachel Young	
RR-0289	Rajo Taylor-Smith	
RR-0290	Raven Anxo	
RR-0291	Richard Dunning	
RR-0292	Richard G. Mitchell	
RR-0293	Richard Gauld	
RR-0294	Richard Howard	
RR-0295	Rita Bryant	
RR-0296	Rob Burbea	
RR-0297	Rob Phillips	
RR-0298	Robert Harrison	
RR-0299	Robert Wishart	
RR-0300	Robin Duxfield	
RR-0301	Rodger Molyneux	
RR-0302	Roger Galley	
RR-0303	Ronwen Walker	
RR-0304	Rosemary Hanson	
RR-0305	Rosie Chester	
RR-0306	Rupert Penny	
RR-0307	Ruth Blaug	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0308	Ryan Penfold	
RR-0309	Sally Brown	
RR-0310	Sally Herriett	
RR-0311	Sandra Waterton	
RR-0312	Sara Collins	
RR-0313	Sara Marlow	
RR-0314	Sarah Downing	
RR-0315	Sarah Richards	
RR-0316	Seamus O'Connell	
RR-0317	Sharon Whalley	
RR-0318	Silvia Kogan	
RR-0319	Simon Barber	
RR-0320	Simon L. Boddie	
RR-0321	Simon Norton	
RR-0322	Simon Woods	
RR-0323	Sonia Davey	
RR-0324	Sophia Harris	
RR-0325	Stacey Beard	
RR-0326	Stephen O'Donnell	
RR-0327	Steve Mackie	
RR-0328	Steven Trueman	
RR-0329	Susan Coppard	
RR-0330	Susan Ponton	
RR-0331	Tanya Stobbs	
RR-0332	Terry Jackson-Baker	
RR-0333	Terry Winstanley	
RR-0334	Francis Taylor	The Council for British Archaeology - Wessex Region
RR-0335	Tim Woodland	
RR-0336	Timothy Clark	
RR-0337	Timothy Hughes	
RR-0338	Timothy Lloyd	
RR-0339	Tom Killick	
RR-0340	Tony	
RR-0341	Tony Conder	
RR-0342	Tracey Butcher	
RR-0343	Viola Sampson	
RR-0344	Walter Zuk	
RR-0345	Wendy Bradnam	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0346	Helgaleena Healingline	White Rabbit Grove RDNA
RR-0347	Will Kemp	
RR-0348	William Leslie Hambrook	
RR-0349	Yowann Byghan	
RR-0350	Stuart Culliford	
RR-0351	AC	
RR-0352	Adrian Burrows	
RR-0353	Al Dalgarno	
RR-0354	Alban Brindle	
RR-0355	Alison Smith	
RR-0356	Amritam Mills	
RR-0357	Andrea Cathers	
RR-0358	Andrea Wordsworth	
RR-0359	Andrew Gibson	
RR-0360	Andrew McIntyre	
RR-0361	Andrew Nicolson	
RR-0362	Andrew Purbrick	
RR-0363	Andrew Whitehurst	
RR-0364	Angela Blaydon	
RR-0365	Angela Miles	
RR-0366	Anjali Kaur	
RR-0367	Ann Mee	
RR-0368	Anna Sandfield	
RR-0369	Anne Mackay	
RR-0370	Anne Turner	
RR-0371	Anne Wareing	
RR-0372	Anthony Lewis	
RR-0373	Anthony Roberts	
RR-0374	Arthur Marchant	
RR-0375	B C B Lynn	
RR-0376	Berit Pedersen	
RR-0377	Bill Smith	
RR-0378	Bob Watts	
RR-0379	Brenda McAuliffe	
RR-0380	Myra Bennett	British Horse Society
RR-0381	Bruce O'Connor	
RR-0382	C A Morrell	
RR-0383	Cara Naden	
RR-0384	Carmelle Ryan-Sammon	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0385	Carole Shorney	
RR-0386	Caroline Murray	
RR-0387	Caroline van Oostrom	
RR-0388	Carolyn Kennett	
RR-0389	Catherine Le Grice-Mack	
RR-0390	Charlotte Cornwell	
RR-0391	Charlotte Moncrieff	
RR-0392	Cherry Lavell	
RR-0393	Chris Auld	
RR-0394	Chris Olende	
RR-0395	Chris Shipley	
RR-0396	Christopher Day	
RR-0397	Christopher Lovegrove	
RR-0398	Christopher Willey	
RR-0399	Claire Aartsen	
RR-0400	Colin Kane	
RR-0401	Colin Taylor	
RR-0402	Coral Reynolds	
RR-0403	Dario Gerchi	
RR-0404	David Brown	
RR-0405	David Cavany	
RR-0406	David Chapman	
RR-0407	David Cockshoot	
RR-0408	David Hazell	
RR-0409	David Higgins	
RR-0410	David Mee	
RR-0411	David Miller	
RR-0412	David P Marson	
RR-0413	David Rawlins	
RR-0414	David Watts	
RR-0415	David Wilson	
RR-0416	Deborah Evans	
RR-0417	Denis Parrett	
RR-0418	Denise Corlett	
RR-0419	Derek Pitman	
RR-0420	Diane Murphy	
RR-0421	Don Church	
RR-0422	Doran Waclawiak	
RR-0423	Dr H Kean	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0424	Dr Robert Insall	
RR-0425	Dr. Chris Tonge	
RR-0426	Duncan Collier	
RR-0427	E.Sansom	
RR-0428	Edward Mitchell	
RR-0429	Edwin Robson	
RR-0430	Elaine Blackman	
RR-0431	Elena Pan-Sesar	
RR-0432	Elgiva Tiptaft	
RR-0433	Elizabeth Bavister	
RR-0434	Elizabeth Trueman	
RR-0435	Ellen Barnes	
RR-0436	Emma Curtis	
RR-0437	Emma Lloyd	
RR-0438	Emma Spurgin Hussey	
RR-0439	Enid Knight	
RR-0440	F W G Whiting	
RR-0441	Fay Funnell	
RR-0442	Fiona Bradley	
RR-0443	Fiona Wall	
RR-0444	Francis Edwards	
RR-0445	George Bailey	
RR-0446	Gordon Stephens	
RR-0447	Gus Hauptfleisch	
RR-0448	Hazel Tufton	
RR-0449	Heather Elston	
RR-0450	Heidi Mitchell	
RR-0451	Helen Denning	
RR-0452	Henry Lowther	
RR-0453	Hilary Douglas-Wood	
RR-0454	Hilary Hampton	
RR-0455	Hugh Williamson	
RR-0456	Ian Bendle	
RR-0457	Ian Brodrick	
RR-0458	Isabelle Vinet	
RR-0459	Ivan Clowsley	
RR-0460	Jacqueline Heraty	
RR-0461	James Blake	
RR-0462	James Davies	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0463	James Rodwell	
RR-0464	Janet Hicks	
RR-0465	Jason Hargreaves	
RR-0466	Jessica Potter	
RR-0467	Jill Kempshall	
RR-0468	Jillian Head	
RR-0469	Jim Fisher	
RR-0470	Joan Osborne	
RR-0471	Joan Smith	
RR-0472	Joanna Millett	
RR-0473	John Ashton	
RR-0474	John Brown	
RR-0475	John Davis	
RR-0476	John Dunbar	
RR-0477	John Firth	
RR-0478	John Hendry	
RR-0479	John M Clements	
RR-0480	John M. McGee	
RR-0481	John Moon	
RR-0482	John Mortimer	
RR-0483	John Nicholas Metcalfe	
RR-0484	John R Hartill	
RR-0485	John Rose	
RR-0486	Jon Humphrey	
RR-0487	Josephine Dickinson	
RR-0488	Josephine Gabriel	
RR-0489	Karan Smith	
RR-0490	Karen Fishet	
RR-0491	Karen Jordan	
RR-0492	Karen Matthews	
RR-0493	Karl Lerocq	
RR-0494	Kate Kenzie	
RR-0495	Katherine Suzanne Bray	
RR-0496	Kathy Kirby	
RR-0497	Katrina James	
RR-0498	Kelly Williamson	
RR-0499	Kevin Webb	
RR-0500	Lady Roisin Robertson	
RR-0501	Lea Surs	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0502	Les Hudson	
RR-0503	Lesley Arrowsmith	
RR-0504	Lesley Docksey	
RR-0505	Lesley Wertheimer	
RR-0506	Linda Cadier	
RR-0507	Lisa Mills	
RR-0508	Louise Smith	
RR-0509	Lucia Nixon	
RR-0510	M A Taylor	
RR-0511	M King	
RR-0512	Maggie Brotherston	
RR-0513	Marcus Naylor	
RR-0514	Margaret Barrett	
RR-0515	Mark Robinson	
RR-0516	Marshall Stapleton	
RR-0517	Martin Ash	
RR-0518	Mary Bates	
RR-0519	Maxine McAdams	
RR-0520	Melanie Humphries-Cuff	
RR-0521	Michael Carver	
RR-0522	Mick Cannon	
RR-0523	Mickey Gibb	
RR-0524	Mike Newton	
RR-0525	Mr B J Craven	
RR-0526	Mr Derek Langley	
RR-0527	Mr G L Rogers	
RR-0528	Mr Hugh L Williams	
RR-0529	Mr Phillip M Donegan	
RR-0530	Mr Warwick Conway	
RR-0531	Mr. Arthur Phillipson	
RR-0532	Mrs Janet Collier	
RR-0533	Mrs Jenny Langley	
RR-0534	Mrs Sara Bryant	
RR-0535	Mrs Shirley Brailey	
RR-0536	Mrs. Jennifer Combe	
RR-0537	Ms Lawrence	
RR-0538	Ms Angie Rankin	
RR-0539	Ms Emma E Landers	
RR-0540	Ms Hannah Sassoon	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0541	Muriel Passmore	
RR-0542	Neal Mason	
RR-0543	Neil Cosburn	
RR-0544	Neil Taylor	
RR-0545	Nicholas C Lutwyche	
RR-0546	Nicola Gray	
RR-0547	Nicola Ogborn	
RR-0548	Nigel Foster	
RR-0549	Nigel Spring	
RR-0550	Norman Burr	
RR-0551	Oliver Lavery	
RR-0552	P F Vincent	
RR-0553	Pam Dewey	
RR-0554	Paul Dachtler	
RR-0555	Paul Maddox	
RR-0556	Paula C Williams	
RR-0557	Paula Fiorentini-Carter	
RR-0558	Pete Davies	
RR-0559	Peter Addyman	
RR-0560	Peter Blacklock	
RR-0561	Peter Davis	
RR-0562	Peter Goodhugh	
RR-0563	Peter Pick	
RR-0564	Phil Spencer	
RR-0565	Philip Herridge	
RR-0566	Philip John Burbidge	
RR-0567	Philippa Rathborne	
RR-0568	Phillip Nash	
RR-0569	Rachel Dobbie	
RR-0570	Rachel Townsend	
RR-0571	Rebecca Lock	
RR-0572	Rhiannon	
RR-0573	Richard Barnard	
RR-0574	Richard Freeman	
RR-0575	Richard Holt	
RR-0576	Richard Livings	
RR-0577	Richard Stradling	
RR-0578	Richard White	
RR-0579	Robert Spence	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0580	Rodney Marlow	
RR-0581	Roger Ferrand	
RR-0582	Roland White	
RR-0583	Ron Whitehouse	
RR-0584	Ros Coombs	
RR-0585	Rosamund Kidman Cox	
RR-0586	Rose Deakin	
RR-0587	Phil Sheldrake	Royal Society for the Protection of Birds
RR-0588	Rupert Stewart Cox	
RR-0589	Ruth McCabe	
RR-0590	Ruth Wilson	
RR-0591	Saira Gregory	
RR-0592	Sally-Shakti Willow	
RR-0593	Samantha Oades	
RR-0594	Samuel Rice	
RR-0595	Sandra Braham	
RR-0596	Sara Daw	
RR-0597	Sarah Basley	
RR-0598	Sarah Pascoe	
RR-0599	Sarah Perrett	
RR-0600	Sarah Saatzer	
RR-0601	Shelagh Day	
RR-0602	Sime Wright	
RR-0603	Simon Bending	
RR-0604	Stephanie Stephenson	
RR-0605	Stephen Brown	
RR-0606	Steve Beech	
RR-0607	Stuart Roe	
RR-0608	Susan Canney	
RR-0609	Suzanne Battison	
RR-0610	Suzanne Keene	
RR-0611	T J Simpson	
RR-0612	Terry Baldwin	
RR-0613	John Curtis	The 1805 Club
RR-0614	Tim Woodcock	
RR-0615	Tom Currant	
RR-0616	Tom Swithinbank	
RR-0617	Tony Pywell	
RR-0618	Trev Tyers	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0619	Vaughan Hill	
RR-0620	Viviane Garbe	
RR-0621	Wickey Farmer	
RR-0622	William Daly	
RR-0623	Yvonne Crone	
RR-0624	Z Dean	
RR-0625	Ziya Dikbas	
RR-0626	Zoe Day	
RR-0627	Adele Sharp	
RR-0628	Alexander Coombs	
RR-0629	Amelia	
RR-0630	Andrea Allen	
RR-0631	Andrew Morgan	
RR-0632	Andy Beverley	
RR-0633	Angela Douglas	
RR-0634	Anna Beria	
RR-0635	Anne Hollings	
RR-0636	Anne Ludlow	
RR-0637	Anne Robinson	
RR-0638	Annie Barlow	
RR-0639	Bernard Douglas-Wood	
RR-0640	Britt	
RR-0641	Claire Conlon	
RR-0642	Dan Ward	
RR-0643	Dave King	
RR-0644	David Bell	
RR-0645	David Bernson	
RR-0646	David Hollingd	
RR-0647	David R Matthews	
RR-0648	David Texidor	
RR-0649	David Trethewey	
RR-0650	Denis Rumbold	
RR-0651	Dr Gwenda Wild	
RR-0652	Dr Ian M Spencer	
RR-0653	Dr Ken Taylor	
RR-0654	Dr Michael Tillbrook	
RR-0655	Elizabeth L Feil	
RR-0656	Felicity Davies	
RR-0657	Gabriela Ustic	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0658	Gilly Hodgkinson	
RR-0659	Gordon Bird	
RR-0660	Graham Burgess	
RR-0661	Graham Dunbar	
RR-0662	Graham Vincent	
RR-0663	Harriet Brooke	
RR-0664	Heather Garbutt	
RR-0665	Henry Colthurst	
RR-0666	Ian Bradley	
RR-0667	Jacqueline Milmail	
RR-0668	James Giuseppi	
RR-0669	Jeanne Rodgers	
RR-0670	Jo Woolley	
RR-0671	John Goodwin	
RR-0672	John Tyler	
RR-0673	Judith Anne El-Mahmoud	
RR-0674	Katherine Martin	
RR-0675	Kevin Clarke	
RR-0676	Linda Francavilla	
RR-0677	Linda Rudolph	
RR-0678	Lisa I Frampton	
RR-0679	Lucia Birch	
RR-0680	Lucy Phillips	
RR-0681	Lucy Wildblood	
RR-0682	Maddy Tanner	
RR-0683	Margaret Muirhead	
RR-0684	Mark Linfield	
RR-0685	Michael Amos	
RR-0686	Miss J Turner	
RR-0687	Mr Bruce Coleman	
RR-0688	Mr Don Donovan	
RR-0689	Mrs R Perrow	
RR-0690	Ms Christine M Wheatley	
RR-0691	Ms D Richens	
RR-0692	Ms Jeanne Spinks	
RR-0693	Neil Sutherland	
RR-0694	Nic Lee	
RR-0695	Nigel Gilderson	
RR-0696	Nigel Gill	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0697	Nile Nugnez	
RR-0698	Patricia Shaw	
RR-0699	Penelope Andrews	
RR-0700	Penny Gaines	
RR-0701	Peter Lynn	
RR-0702	Peter Matthews	
RR-0703	Peter Warden	
RR-0704	Philip Feakin	
RR-0705	Philippa Roll	
RR-0706	Robert Barnett	
RR-0707	Rory Weightman	
RR-0708	Roy Lawson	
RR-0709	Roz Whitaker	
RR-0710	Rupert Stocks	
RR-0711	S Strain	
RR-0712	Sarah Barratt	
RR-0713	Shanni Ong	
RR-0714	Shirley Brewer	
RR-0715	Siobhan Winter-Smith	
RR-0716	Stephanie Tickner	
RR-0717	Stephen Kent	
RR-0718	Tessa Mills	
RR-0719	Tony Cook	
RR-0720	Vanessa Langford	
RR-0721	Will Mowat	
RR-0722	William Warren	
RR-0723	Adrian James	
RR-0724	Aileen Edwards	
RR-0725	Alan Marlow	
RR-0726	Andy Paterson	
RR-0727	Anyia Thompson	
RR-0728	Aurora Yaacov	
RR-0729	Chris Evans	
RR-0730	Chris Ford	
RR-0731	Chris Freimanis	
RR-0732	Christian Potiszil	
RR-0733	Sue Coles	Cycling UK
RR-0734	Dr Jeff Oliver	
RR-0735	Ellis Glyn Jones	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0736	George Muirhead	
RR-0737	Gill Greenwood	
RR-0738	Glyn Calvert	
RR-0739	Heather Collins	
RR-0740	Helen Armitage	
RR-0741	Jack Holland	
RR-0742	Jacqueline Brown	
RR-0743	John Barnes	
RR-0744	Karen Bailey	
RR-0745	Karen Espley	
RR-0746	Kathryn Baker	
RR-0747	Kiana Miles	
RR-0748	L J Partridge	
RR-0749	Mitchell A Mccarthy	
RR-0750	Morgan Serres	
RR-0751	Mr M. Redfern	
RR-0752	Natasha Wilson	
RR-0753	Nick Wakelam	
RR-0754	Paul Marchant	
RR-0755	Richard Baxter	
RR-0756	Sara Bellisio	
RR-0757	Searles O'Dubhain	
RR-0758	Stephen Greenwood	
RR-0759	Sue Scholan	
RR-0760	Sue Weaver	
RR-0761	Sue Y Symmons	
RR-0762	Valerie Stagg	
RR-0763	Wendy Freeman	
RR-0764	Anne Stocker	
RR-0765	Belinda Lopez	
RR-0766	David Gardner	
RR-0767	Deborah Hedderwick	
RR-0768	Elly	
RR-0769	Irene Henson	
RR-0770	Jacqueline Levin	
RR-0771	Jay Hawkins	
RR-0772	John Shaw	
RR-0773	Jon Preston	
RR-0774	Jozi Norton	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0775	Ken Grayling	
RR-0776	Margaret Price	
RR-0777	Michael Wells	
RR-0778	Miss Iris Neel	
RR-0779	Mr I Mack	
RR-0780	Olga Grapsas	
RR-0781	Raven De Bonaire	
RR-0782	Robin Heywood	
RR-0783	Rosemary Jones	
RR-0784	Leonard Becker	Sacred Sites International Foundation
RR-0785	Sonia Ashby	
RR-0786	Teresa Seabrook	
RR-0787	Genevieve St George	The 1805 Club
RR-0788	Tony Saggars	
RR-0789	Wendy E. Morrison	
RR-0790	Alan Stephen Wood	
RR-0791	Alexandra Veres	
RR-0792	Andy Mackenzie	
RR-0793	Christina Stynes	
RR-0794	Graham Wickham	
RR-0795	James Booth	
RR-0796	Justin Ayres	
RR-0797	Karen O'Heare	
RR-0798	Kate Eldridge	
RR-0799	L Foster	
RR-0800	Lyn Brayshaw	
RR-0801	Miss Sian Twigge	
RR-0802	Nick Jones	
RR-0803	Nycki Owen	
RR-0804	Odo Saunders	
RR-0805	Ollie Barron	
RR-0806	Sam McAdams	
RR-0807	Tiffany Stephens	
RR-0808	William Brown	
RR-0809	David Clark	Andover Ramblers
RR-0810	Brian Simms	
RR-0811	Brian Turner	
RR-0812	Captain Nick Kettlewell,RN	
RR-0813	Carrie Jackson	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0814	Daniel Demmel	
RR-0815	David Durkin	
RR-0816	Gillian Madge	
RR-0817	Grant Munro	
RR-0818	James Bickerton	
RR-0819	Jennifer Smethurst	
RR-0820	Jim Rayner	
RR-0821	John Phillips	
RR-0822	Jonathan Dixon	
RR-0823	Kelly Cannon	
RR-0824	Laura Lorson	
RR-0825	Maggy Simms	
RR-0826	Martin Gem	
RR-0827	Matthew Sutcliffe	
RR-0828	Mollie Semple	
RR-0829	Mr. Duncan Noble	
RR-0830	Mrs Iris Holden	
RR-0831	Mrs Lindsay Cutts	
RR-0832	Ms Catharine M Newman	
RR-0833	Ms Ros Smith	
RR-0834	Pauline Moran	
RR-0835	Peter Gombera	QinetiQ Group Plc
RR-0836	Regina De Giovanni	
RR-0837	Robert Griffin	
RR-0838	Susan Hopkinson	
RR-0839	David Dawson	Wiltshire Archaeological and Natural History Society
RR-0840	Wendy Bown	Amesbury Town Council
RR-0841	Dawn Watson	
RR-0842	Gemma Ellis	
RR-0843	Geoffrey Allan	
RR-0844	James Higgs	
RR-0845	Kate Prendergast	
RR-0846	Leon Maschner	
RR-0847	Lynn Evans	
RR-0848	Lynn Lovell	
RR-0849	Mrs Lindy Ayubi	
RR-0850	Sacha Rossi	NATS LTD
RR-0851	Paul Workman	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0852	Richard Metcalfe	
RR-0853	Robert Scott-Jupp	
RR-0854	Sally Rich	
RR-0855	Steve Cox	
RR-0856	Stuart Haigh	
RR-0857	Thomas Grayson-Smith	
RR-0858	Carter Jonas LLP	Travelodge Hotels Limited
RR-0859	Tim Lewis	Wiltshire Ramblers
RR-0860	Yvonne Gillian	
RR-0861	Stephen Stacey	Avebury Parish Council
RR-0862	David Hobbs	
RR-0863	Diana Graham	
RR-0864	Dr Andrew Shuttleworth	
RR-0865	Dr Brian Kemplay	
RR-0866	John Hughes	
RR-0867	Judith Whiteley	
RR-0868	Penelope Rowe	
RR-0869	Peter Barker	
RR-0870	Roger Brake	
RR-0871	Stuart Fyfe	
RR-0872	Patricia Martz	California Cultural Resources Preservation Alliance, Inc.
RR-0873	Paula Downard	Cycling Opportunities Group Salisbury (COGS)
RR-0874	Deborah Conway-Read	
RR-0875	Fleur Doidge	
RR-0876	Frances Bolland	
RR-0877	Hal Ewing	
RR-0878	Howard Carter	
RR-0879	Julia P B MacBeath	
RR-0880	Lozz Starseed	
RR-0881	Mike Pitts	
RR-0882	Mrs Laura Derry Fellows	
RR-0883	Ruth Parham	
RR-0884	Victor Anderson	
RR-0885	Al Russell	
RR-0886	Andrew Fitzpatrick	
RR-0887	Carly Bannister	
RR-0888	Elizabeth Wilson	
RR-0889	Ewa Piskorz	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0890	Kate Tobin	Forestry Commission
RR-0891	Ms. Susu Jeffrey	Friends of Coldwater
RR-0892	Oliver Denman	
RR-0893	Robert Parker	
RR-0894	Roger Upfold	
RR-0895	Tom James	
RR-0896	Wiltshire Council	Western Gateway Shadow Sub-National Transport Body
RR-0897	William Gowers	
RR-0898	Charles Moore	
RR-0899	Danielle Ridley	
RR-0900	Darren Thompson	
RR-0901	David Wray	
RR-0902	Dr Rob Holland	
RR-0903	Emma Jackson	
RR-0904	Jack Bryant	
RR-0905	James Chandler	
RR-0906	John Cagan	
RR-0907	John Whitaker	
RR-0908	Marc Driscoll	
RR-0909	Michael Nash	
RR-0910	Mr Timothy Buttle	
RR-0911	Neil Burton	
RR-0912	Shaun Drew	
RR-0913	Alex Dougal	
RR-0914	Gerry Lowe	
RR-0915	Helen Warren	
RR-0916	James Martin	
RR-0917	Janet Allyn	
RR-0918	Maria Collins-Horne	
RR-0919	Martin Murphy	
RR-0920	Wendy George	
RR-0921	Stephen Carleysmith	Worthing Green Party
RR-0922	Dr Mark A E Nixon	
RR-0923	James Knight	
RR-0924	Michael Rstcliffe	
RR-0925	Saara Jaffery	
RR-0926	Andrew Broadbent	
RR-0927	Anne Amison	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0928	Astrid Garran	
RR-0929	Carole Humber	
RR-0930	Del Pickup	
RR-0931	Jamie Roberts	
RR-0932	Matt Leivers	
RR-0933	Mrs Tracey Lynam	
RR-0934	Nicholas Mursy Jones	
RR-0935	Nina Patrick	
RR-0936	Brenda Morrison-Webb	
RR-0937	Christine Tanski	
RR-0938	Dr Cathy Roberts	
RR-0939	Leon Russell Davies	
RR-0940	Sandra Laing	
RR-0941	Sonja Chan	
RR-0942	Stewart Ford	
RR-0943	Colin Boyle	
RR-0944	Heather Marshall	
RR-0945	James Watts	
RR-0946	Jay Sacher	
RR-0947	Joan Crosbee	
RR-0948	Pauline Gibson	
RR-0949	Robert Christensen	
RR-0950	Roger Hillier	
RR-0951	Rosemary Hogg	
RR-0952	Heather Miranda	
RR-0953	Jeanette Mackenzie	
RR-0954	Peter Wheeler	
RR-0955	Alan Langston	
RR-0956	Anita Parker	
RR-0957	Ingrid Peckham	
RR-0958	Rachael Jack	
RR-0959	Assuntina Cardillo Zallo	
RR-0960	Anne Sutcliffe	
RR-0961	Bente Hessellund Andersen	
RR-0962	Daniel Priestley	
RR-0963	David Bearne	
RR-0964	Jackie Surtees	
RR-0965	Jake Stratton-Kent	
RR-0966	John Barron	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-0967	Margaret Hartnoll	
RR-0968	Michael Cope	
RR-0969	Michelle Sallis	
RR-0970	Steve Lake	
RR-0971	Alison Onslow	
RR-0972	Andrea Moore	
RR-0973	Anthony Suddaby	
RR-0974	David Fisk	
RR-0975	Fliss Argent	
RR-0976	Hugh Caslake	
RR-0977	James dewhurst	
RR-0978	John Pollock	
RR-0979	John Souter	
RR-0980	Kirk Hansen	
RR-0981	Laura Blake	
RR-0982	Laura Ingram	
RR-0983	Marc Rhodes-Taylor	
RR-0984	Matt Fitzmaurice	
RR-0985	Matt Phillips	
RR-0986	Molly James	
RR-0987	Mr Dominic Palumbo	
RR-0988	Ms Veronica Fraser	
RR-0989	Nicola Hughes	
RR-0990	Nigel Taylor	
RR-0991	Nina Jacoby-Owen	
RR-0992	Rachel Stephens	
RR-0993	Robert Springate	
RR-0994	Sally Fisher	
RR-0995	Sarah Bell	
RR-0996	Stephen Morallee	
RR-0997	Stephen Staple	
RR-0998	Theresa McGill	
RR-0999	Kit Thomas	
RR-1000	Alan Welsted	
RR-1001	Andrew Wright	
RR-1002	Belle Doyle	
RR-1003	Philip Sterling	Butterfly Conservation
RR-1004	Caroline Sheldon	
RR-1005	David Bruce	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1006	Gabriela Wright	
RR-1007	Helen Milne	
RR-1008	Ian West	
RR-1009	Jan McKernan	
RR-1010	Jill Malenoir	
RR-1011	Margaret Willmot	
RR-1012	Mark Richard Willett	
RR-1013	Matthew Sleigh	
RR-1014	RG Iliffe	
RR-1015	Saffron Chapman	
RR-1016	Sarah Smith	
RR-1017	Angela Thompson	
RR-1018	Christine Bottomley	
RR-1019	Clare Moody MEP	
RR-1020	David Bircumshaw	
RR-1021	Elizabeth Turner	
RR-1022	Felicity Tanous	
RR-1023	Fiona Worrell	
RR-1024	Graeme Wistow	
RR-1025	Julie Davenport	
RR-1026	Linda Johns	
RR-1027	Lisa Mead	
RR-1028	Lisa Rose	
RR-1029	Paul Garwood	
RR-1030	Prof. M. Parker Pearson	
RR-1031	Stuart Morrison	
RR-1032	Dr A M (Martin) Antheunisse	Wessex Chalk Stream and Rivers Trust
RR-1033	Aaron Quinn	
RR-1034	Alexander Wooldridge Smith	
RR-1035	Andrew McKellar	
RR-1036	Annie MacDougall	
RR-1037	Ashleigh Horton	
RR-1038	Brendan Thorpe	
RR-1039	Budha Tony bodhisatva	
RR-1040	Prof. M. Parker Pearson	Consortium of 22 Stonehenge experts
RR-1041	Andrew Grant	E. Grant & Sons
RR-1042	Emma Goodjohn	
RR-1043	Francis William George Whiting	
RR-1044	James Henderson	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1045	Joseph Mason	
RR-1046	Louise Whiting	
RR-1047	Olivia Dutton	
RR-1048	Penny Baker	
RR-1049	S. Brooks	
RR-1050	Christopher Gillham	
RR-1051	Elizabeth Spickernell	
RR-1052	Mr Alan Simkins	Heritage Action
RR-1053	Jonathan Smith	
RR-1054	Laura Clarke	
RR-1055	Mrs. J. Combe	
RR-1056	Pete Woolf	
RR-1057	Peter Royston Baker Jones	
RR-1058	Robin Foster	
RR-1059	Sara Goodger	
RR-1060	Angel Grace	The Druid Order of Avebury
RR-1061	Victoria Rhodes-Leaman	
RR-1062	Abigail Kent	
RR-1063	Andrew Dipper	
RR-1064	Andrew Woolley	
RR-1065	Angela Lewis	
RR-1066	Anita Watson	
RR-1067	Arch Druid Wayne Hughes	
RR-1068	Beryl James	
RR-1069	Bibo Hustler	
RR-1070	Bob Poston	
RR-1071	Carole Mora	
RR-1072	Caroline Deakin	
RR-1073	Caroline Guy	
RR-1074	Catherine Allen	
RR-1075	Catherine Sisterson	
RR-1076	Chris Bryan	
RR-1077	Christine Conway	
RR-1078	Christopher Dando	
RR-1079	Damien Coles	
RR-1080	David John Weale	
RR-1081	David Powell	
RR-1082	Debbie Crabb	
RR-1083	Debbie Wiles	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1084	Debby Muir	
RR-1085	Derrick Coffee	
RR-1086	Dominic Russell	
RR-1087	Dr Christopher Chippindale	
RR-1088	Eric Fitch	
RR-1089	Gareth Read	
RR-1090	Gary Richards	
RR-1091	Glen Davis	
RR-1092	Harriet Thomas	
RR-1093	Ian McKone	
RR-1094	Ivo Van Sandick	
RR-1095	Jenny Seagrove	
RR-1096	Joanne Anderson	
RR-1097	John LeGrove	
RR-1098	Karlia Bradley-Boddy	
RR-1099	Kate Cameron-Daum	
RR-1100	Kate Freeman	
RR-1101	Katherine Safi	
RR-1102	Kay Hall	
RR-1103	Kerry Hennigan	
RR-1104	Kim Le Patourel	
RR-1105	Lewis Mosse	
RR-1106	Linda Fausey	
RR-1107	Margaret Perryman	
RR-1108	Mark Bailey	
RR-1109	Martin Walker	
RR-1110	Matt Early	
RR-1111	Melanie Watkiss	
RR-1112	Michael O'Doherty	
RR-1113	Mike Yeadon	
RR-1114	Miles Newman	
RR-1115	Mrs E Hall	
RR-1116	Nick Richardson	
RR-1117	Pat Jones-Jenkins	
RR-1118	Paul Battram	
RR-1119	Penelope Sheldon	
RR-1120	Peter Todd	
RR-1121	Peter Varley	
RR-1122	Philippa Greening	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1123	Polly Marshall	
RR-1124	Rachel Montgomery	
RR-1125	Richard Moore	
RR-1126	Richard Sutcliffe	
RR-1127	Robert Cook	
RR-1128	Robin Watson	
RR-1129	Samuel Dale	
RR-1130	Sara Mills	
RR-1131	Simon Banks	
RR-1132	Simon Howell	
RR-1133	Sophie Wright	
RR-1134	Susan Thomas	
RR-1135	Susanne James	
RR-1136	Susie Thornhill	
RR-1137	Tim Schadla-Hall	
RR-1138	Tracey Gunner	
RR-1139	Veronica Cossanteli	
RR-1140	Victoria Ridley	
RR-1141	W.E. Dunn	
RR-1142	Yvonne Dunn	
RR-1143	Alfred Gliddon	
RR-1144	Alice Nunn	
RR-1145	Alison Leonard	
RR-1146	Amanda Allen	
RR-1147	Andrew Flint Shipman	
RR-1148	Angela Gray	
RR-1149	Ann Jones	
RR-1150	Ann Williams	
RR-1151	Anna N Oake	
RR-1152	Anne Davidson	
RR-1153	Anne-Marie Wardlaw	
RR-1154	Annette Smith	
RR-1155	Anthony Guy Simmons	
RR-1156	John Laker	Archaeology in Marlow
RR-1157	Becky Maxwell	
RR-1158	Benita Maginnes	
RR-1159	Robin Heath	Bluestone Press
RR-1160	Brian Taverner	
RR-1161	Brian Williams	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1162	Brian Williamson	
RR-1163	Brona Langton	
RR-1164	Carol Anne Jones	
RR-1165	Carolanne Ellis-Brewer	
RR-1166	Caroline	
RR-1167	Caroline Jones	
RR-1168	Caroline Morgan	
RR-1169	Caroline Thorne	
RR-1170	Carolyne Roberts	
RR-1171	Ceri Jones	
RR-1172	Charlie Roberts	
RR-1173	Charlotte Brooks	
RR-1174	Charlotte Browning	
RR-1175	Christine Alexander	
RR-1176	Christine Bilsland	
RR-1177	Christine Moody	
RR-1178	Christopher Hosier	
RR-1179	Christos Grapsas	
RR-1180	Craig Newton	
RR-1181	Dafila Scott	
RR-1182	Daniel Peel	
RR-1183	Darren Cox	
RR-1184	David Campkin	
RR-1185	David Glover	
RR-1186	David Hurry	
RR-1187	David Lambie	
RR-1188	David Robinson	
RR-1189	David Ware	
RR-1190	DD	
RR-1191	Debra Bly	
RR-1192	Deja Whitehouse	
RR-1193	Derek West	
RR-1194	Diana Mills	
RR-1195	Diana Wilson	
RR-1196	Diane Castledine	
RR-1197	Diane Drummond	
RR-1198	Diane Gan	
RR-1199	Diane Hughes	
RR-1200	Dianne Sherlock	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1201	Dick Finch	
RR-1202	Dominic Kane	
RR-1203	Doreen Martin	
RR-1204	Dr Neil Tunnicliffe	
RR-1205	Duncan Parrish	
RR-1206	Easter Russell	
RR-1207	Elizabeth Fletcher	
RR-1208	Elizabeth Kellett	
RR-1209	Elizabeth Roach	
RR-1210	Emma May	
RR-1211	Eric Yeatman-Biggs	
RR-1212	Fawn Ricciuti	
RR-1213	Fiona Lorimer	
RR-1214	Fiona Yorgensen	
RR-1215	Frances Jordan	
RR-1216	Frank Winfield	
RR-1217	Freda Banks	
RR-1218	Frederick Witts	
RR-1219	Gary McCrory	
RR-1220	George Brew	
RR-1221	Geraldine Price	
RR-1222	Gilbert Burleigh	
RR-1223	Gillian Griffiths	
RR-1224	Gladys Vellamaa	
RR-1225	Grant Pagan	
RR-1226	Greg Peakin	
RR-1227	Helen Gray	
RR-1228	Helen Marie Darlington	
RR-1229	Helen Parkinson	
RR-1230	Helen Webb	
RR-1231	Hilary Duckett	
RR-1232	Ian Lewis	
RR-1233	J Hartley	
RR-1234	J Parker	
RR-1235	Jackie Coleman	
RR-1236	Jackie Kimberley	
RR-1237	Jacquelyn Miles	
RR-1238	James Butler	
RR-1239	James Wicks	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1240	Jan Goodey	
RR-1241	Jane	
RR-1242	Jane Mathew-Byrne	
RR-1243	Janet Sweet	
RR-1244	Janetta Morton	
RR-1245	Jayne Soakell	
RR-1246	Jennifer Stephens	
RR-1247	Jill Cross	
RR-1248	Jill Marrington	
RR-1249	Jo Hand	
RR-1250	Joanna Fletcher	
RR-1251	Joanna French	
RR-1252	Joanna Herbert-Stepney	
RR-1253	Joanna Rial	
RR-1254	Joanne Honebon	
RR-1255	Joely Hayes	
RR-1256	John Blakely	
RR-1257	John Bowley	
RR-1258	John Callow	
RR-1259	John Cunningham	
RR-1260	John Hellis	
RR-1261	Jonathan Hall	
RR-1262	Joseph Crawley	
RR-1263	Joyce Field	
RR-1264	Joyce Parker	
RR-1265	Judith Fantozzi	
RR-1266	Judith Jannetta	
RR-1267	Julie Edmenson	
RR-1268	Julie Scott	
RR-1269	Karen Harrison	
RR-1270	Karen Light	
RR-1271	Kate Tremain	
RR-1272	Kate Unwin	
RR-1273	Kathleen Mitchell	
RR-1274	Katriona Greenan	
RR-1275	Kay Kirkham	
RR-1276	Kristian Evans	
RR-1277	Laura Hackett	
RR-1278	Laurence Elvin	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1279	Lawrence Daniels	
RR-1280	Dev Anand Balloo	Le Visionaire Vegan and Yoga Society
RR-1281	Leoncia Flynn	
RR-1282	Lesley Ford	
RR-1283	Linda Griffin	
RR-1284	Linda Plummer	
RR-1285	Liz Meadows	
RR-1286	Lou Selene Sayell	
RR-1287	Louisa OShaughnessy	
RR-1288	King Arthur Pendragon	Loyal Arthurian Warband (Druid Order)
RR-1289	Lyn Morgan	
RR-1290	Lynne Walmsley	
RR-1291	M McLaren	
RR-1292	M.I.Bensen	
RR-1293	Maggie Ollerenshaw	
RR-1294	Maggie Parkes	
RR-1295	Malcolm Isted	
RR-1296	Marc Ellis	
RR-1297	Mardi Lee	
RR-1298	Margaret Hughes	
RR-1299	Margaret Robshaw	
RR-1300	Margaret Tatchell	
RR-1301	Mark Alder	
RR-1302	Mark Elson	
RR-1303	Martin Abram	
RR-1304	Martin Redfern	
RR-1305	Martyn Tucker	
RR-1306	Mary Burk	
RR-1307	Mary Moxham	
RR-1308	Matthew Wetton	
RR-1309	May Cadman	
RR-1310	Maya	
RR-1311	Michael Moran	
RR-1312	Mike Dando	
RR-1313	Mike Kear	
RR-1314	Milo Maguire	
RR-1315	Mr Ralph Tillier	
RR-1316	Mr Tom Logue	
RR-1317	Mr. Ian Amderson	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1318	Mrs A Beardon	
RR-1319	Mrs Jacqueline Gaze	
RR-1320	Mrs Kathleen Murphy	
RR-1321	Mrs Sonia Allen	
RR-1322	Mrs. Jennifer Rogers	
RR-1323	Nell Aurelia Admiral	
RR-1324	Niall Mcguire	
RR-1325	Nigel Sheldon	
RR-1326	Pamela Boot	
RR-1327	Pamela Burdett	
RR-1328	Pat Ellmore	
RR-1329	Patricia Johns	
RR-1330	Paul Cochrane	
RR-1331	Paul Hatchwell	
RR-1332	Paul L Rees	
RR-1333	Paul Wilkinson	
RR-1334	Pauline Wilson	
RR-1335	Pearl Cantlie	
RR-1336	Peter Cornish	
RR-1337	Peter Dearden	
RR-1338	Peter Jamieson	
RR-1339	Peter Lane	
RR-1340	Philip Young	
RR-1341	Philippa Clarke	
RR-1342	Poppy Malone	
RR-1343	Rena Hume	
RR-1344	Rhiannon Pettitt	
RR-1345	Rhiannon Rozier	
RR-1346	Richard Cherns	
RR-1347	Robert Insall	
RR-1348	Robert MacCall	
RR-1349	Robin and Win Dewsbury	
RR-1350	Robina Brown	
RR-1351	Robyn Bailey-West	
RR-1352	Roger Clarke	
RR-1353	Roger Gwynn	
RR-1354	Rose Broderick	
RR-1355	Roy Barlow	
RR-1356	Ruth Parkin	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1357	SallyAnn Simpson	
RR-1358	Samuel Lane	
RR-1359	Sandie Clifford	
RR-1360	Sara Stagg	
RR-1361	Sarah Elliott	
RR-1362	Sarah Rooke	
RR-1363	Satch Norton	
RR-1364	Rob Tanner	SEA Oxford
RR-1365	Sean Gannon	
RR-1366	Sean Martin	
RR-1367	Sharon Hall	
RR-1368	Shelagh Weeks	
RR-1369	Simon Aylward	
RR-1370	Spencer John Mulholland	
RR-1371	Stella Westmacott	
RR-1372	Stephanie Carn	
RR-1373	Stephen McDonald	
RR-1374	Stuart Lawrence	
RR-1375	Sue Woodley	
RR-1376	Susan Tovey	
RR-1377	Suzanne R. LaTulipe	
RR-1378	Sylvia Brathwaite	
RR-1379	T Van Hagen	
RR-1380	Thais Leandrini Brand	
RR-1381	Thomas H. Small	
RR-1382	Tony Maddison	
RR-1383	Tony Wallace	
RR-1384	Toon Bakker	
RR-1385	Tracey Lane	
RR-1386	Tracey O	
RR-1387	Valerie Deighton	
RR-1388	Vatche Gulbekian	
RR-1389	Vaughan Baguley	
RR-1390	Victoria E Powell	
RR-1391	Victoria L Diamond	
RR-1392	Victoria Sayell	
RR-1393	Vitor Oliveira Jorge	
RR-1394	Vivien Gawn	
RR-1395	Wendy Hall	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1396	Wendy Mott	
RR-1397	Will Redfearn	
RR-1398	Willem Derde	
RR-1399	William Greenwood OBE	
RR-1400	James Carr	Winterbourne Stoke Parish Council
RR-1401	Yasmin Jensen	
RR-1402	Adam Koronka	
RR-1403	Adrian Lee	
RR-1404	Adrienne Nash	
RR-1405	Agneis Quinn	
RR-1406	Alan Hughes	
RR-1407	Alexander Noble	
RR-1408	Amanda Leon	
RR-1409	Amy Cowie	
RR-1410	Anthony Moore-Bastos	
RR-1411	Anthony Spencer	
RR-1412	Armelle Le Corre	
RR-1413	Dr Andrew Tizzard PhD MCIfA	AS Archaeology & Heritage Services
RR-1414	Ashley Brown	
RR-1415	Austin Kinsley	
RR-1416	B Mair	
RR-1417	Belinda Twiggs	
RR-1418	Beryl Randall	
RR-1419	Bill Caswell	
RR-1420	Candy Balfour	
RR-1421	Chris Knowles	
RR-1422	Chris Meachen	
RR-1423	Christopher Hartnoll	
RR-1424	Christopher Stephens	
RR-1425	Ciaran Donnelly	
RR-1426	Cindy Drinkwater	
RR-1427	Clive Humm	
RR-1428	Cohl Warren-Howles	
RR-1429	Gillian Anlezark	Cycling Opportunitie Group for Salisbury (COGS)
RR-1430	David Bowling	
RR-1431	David SmartKnight	
RR-1432	David Waters	
RR-1433	Dorothy Nelson	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1434	Dr J E Finch	
RR-1435	Dr Jasmine Shadrack	
RR-1436	Dr Philippa Dall	
RR-1437	Dr William Rowlandson	
RR-1438	Elisabetta Fumagalli	
RR-1439	Elizabeth Pike	
RR-1440	Ellen Perrin	
RR-1441	Emma Doughty	
RR-1442	Fatih Turk	
RR-1443	Fiona	
RR-1444	G. Penny	
RR-1445	Gareth Jones	
RR-1446	Gavin Stuart Upton	
RR-1447	Gizella Warburton	
RR-1448	Gordon Cree	
RR-1449	Hazel Finch	
RR-1450	Hilary	
RR-1451	Ian Mitchell	
RR-1452	J. Capell	
RR-1453	Jan Hobbs	
RR-1454	Jane Callaghan	
RR-1455	Jerry Elsmore	
RR-1456	John Colin Gill	
RR-1457	Juliana Freeman	
RR-1458	Karen Marshall	
RR-1459	Karoline Smith	
RR-1460	Kelly Green	
RR-1461	Lesley Kahney	
RR-1462	Linda Mallett	
RR-1463	Llinos Belcher	
RR-1464	Lorraine D'Cunha	
RR-1465	Madeleine Bamfield-Dillon	
RR-1466	Maggie Tallerman	
RR-1467	Marchia Pratt	
RR-1468	Marion Smylie	
RR-1469	Mark Charlwood	
RR-1470	Mary Black	
RR-1471	Mary Milne	
RR-1472	Mary Whiting	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1473	Mavis Linstrum	
RR-1474	Maxine Alexander	
RR-1475	Melvyn Brown	
RR-1476	Michael Farman	
RR-1477	Michael Mudd	
RR-1478	Mike Silver	
RR-1479	Morgan de Clarmont	
RR-1480	Mr DH Palmer	
RR-1481	Mr Jan Erlstedt	
RR-1482	Mr.A.Prince	
RR-1483	Mrs Kelly Day-Adams	
RR-1484	Mrs P A Moulard	
RR-1485	Ms Maryam Halcrow	
RR-1486	Myrna Hayter	
RR-1487	Neil Irving	
RR-1488	Nick Groom	
RR-1489	Nick Thomas	
RR-1490	Nicola Merton-Richards	
RR-1491	Nikki Ward	
RR-1492	Pamela Wilson	
RR-1493	Patricia Whiteside	
RR-1494	Paul D. Burley	
RR-1495	Paul Langham	
RR-1496	Paul Williams	
RR-1497	Paula Hamilton	
RR-1498	Peter Bowyer	
RR-1499	Peter Yorke	
RR-1500	Philomena Hearn	
RR-1501	Phyllis Baker	
RR-1502	Michael Russell	Project Allenby Connaught
RR-1503	Rebecca Kersten	
RR-1504	Judith Plouviez	Rescue, The British Archaeological Trust
RR-1505	Rhodri Evans	
RR-1506	Richard Hobbs	
RR-1507	Richard Mosley	
RR-1508	Richard Sebborn	
RR-1509	Richard Stainer	
RR-1510	Robert Smith	
RR-1511	Rosemary Norton	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1512	Samantha Hamer	
RR-1513	Sara Brough	
RR-1514	Saskia Kent	
RR-1515	Simon Appleyard	
RR-1516	Simon Brough	
RR-1517	Simon Middlecote	
RR-1518	Simon Pemberton	
RR-1519	Steph Windsor	
RR-1520	Stephen Plant	
RR-1521	Steve Gore	
RR-1522	Steve Howe	
RR-1523	Stormie Mills	
RR-1524	Stuart Riches	
RR-1525	Terry Jennings	
RR-1526	Tim Beckmann	
RR-1527	Tim Finch	
RR-1528	Tom Watson	
RR-1529	Valerie Taylor	
RR-1530	Vera Proudlove	
RR-1531	Victoria Goodison-Barak	
RR-1532	Walter Stephen Macnally	
RR-1533	Wendy Foulger	
RR-1534	Wesley Jackson	
RR-1535	Alice Chenery	
RR-1536	Merrett and Co.	Amesbury Abbey Group
RR-1537	PFA Consulting	Amesbury Property Company Limited & ClassMaxi Limited
RR-1538	Andrew Latten	
RR-1539	Andrew Varney	
RR-1540	Anne Telebak	
RR-1541	Arthur Jeffes	
RR-1542	Countryside Solutions	Beacon Hill Land Limited
RR-1543	Belinda Cox	
RR-1544	C A Mould	
RR-1545	Chavela Mora	
RR-1546	Nikki Spreadbury-Clews	Chitterne Parish Council
RR-1547	Claudia Chapman	
RR-1548	Dan Lobb	
RR-1549	Dr Diane McLaren	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1550	Elaine Adams	
RR-1551	Eve Price	
RR-1552	Fran	
RR-1553	Francesca Raphaely Ingold	
RR-1554	Gabrielle Watts	
RR-1555	Grant McAuliffe	
RR-1556	Hannah Reeves	
RR-1557	Hazel Constantine	
RR-1558	Helen Torrance	
RR-1559	Christine Cleere	Honouring the Ancient Dead
RR-1560	Hugh Newman	
RR-1561	Ian Summers	
RR-1562	Jain Haste	
RR-1563	James Falshaw-Skelly	
RR-1564	Jim Mitchell	
RR-1565	Joanne Fone	
RR-1566	John Derby	
RR-1567	Kate Fielden	
RR-1568	Kate Williams	
RR-1569	Kevin Pettitt	
RR-1570	Lee Berwick	
RR-1571	Linda Duffy	
RR-1572	Marc Joseph Custer	
RR-1573	Margaret Hollinghurst	
RR-1574	Margaret Randall	
RR-1575	Marie Ahlin	
RR-1576	Marion Woods	
RR-1577	Mark Blackburn	
RR-1578	Mark King	
RR-1579	Mary McGilloway	
RR-1580	Michael	
RR-1581	Mark Brodier	Ministry of Defence
RR-1582	Mke Digby	
RR-1583	Countryside Solutions	Morrison and King Limited
RR-1584	Howard Smith MRICS	Mr C A Rowland
RR-1585	Mr Steven Taylor	
RR-1586	Countryside Solutions	Mrs Kathleen Edna Crook
RR-1587	Mrs Lynne Crabb	
RR-1588	Howard Smith Mrics	Mrs P M Sandell

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1589	Neil Bedford	
RR-1590	Nick Ballard	
RR-1591	Nigel Drane	
RR-1592	NPGEH. Kniese	
RR-1593	Orla Jackson	
RR-1594	Howard Smith Mrics	P J ROWLAND & SONS (FARMERS) LIMITED
RR-1595	Paul C. Chaney	
RR-1596	Paul Raithby	
RR-1597	Penny Fletcher	
RR-1598	Peter Daw	
RR-1599	Phaedra Elson	
RR-1600	Philip Polley	
RR-1601	Public Health England	
RR-1602	R M Shannon	
RR-1603	Rachel Mayatt	
RR-1604	Richard James Kedie	
RR-1605	Richard Jell	
RR-1606	Fowler Fortescue	Robert Turner
RR-1607	Rockerfella Hennessy	
RR-1608	Rosalie Doekes	
RR-1609	Ruth Bradshaw	
RR-1610	Archdruid Lois Lloyd	Sacred Grove Western Isles & Astronumerical Druid Order
RR-1611	Sarah Cattell	
RR-1612	Sarah Love	
RR-1613	Sarah Tanswell	
RR-1614	Shirley Mills	
RR-1615	Nikki Spreadbury-Clews	Shrewton Parish Council
RR-1616	Sophy Buckley	
RR-1617	Stephen Meakin	
RR-1618	Steven Andrews	
RR-1619	Susan Baker	
RR-1620	Teresa Price	
RR-1621	Geraldine White	The Campaign to Protect Rural England - Wiltshire
RR-1622	Ros O Maolduin	The Irish Fieldschool of Prehistoric Archaeology
RR-1623	Tiffany Reynolds-Flannery	
RR-1624	Tula Chiarletti	
RR-1625	Vita FitzSimons	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1626	Somerset County Council	A303/A30/A358 Improvement Partnership
RR-1627	Ainsley Allmark	
RR-1628	Alan Shipgood	
RR-1629	Aleta Mckechnie	
RR-1630	Alex Gimblett	
RR-1631	Aline MacInnes	
RR-1632	Alison Dewar	
RR-1633	Alison Hall	
RR-1634	Alistair Sommerlad	
RR-1635	Amanda Ayre	
RR-1636	Andrea Dalton-Mills	
RR-1637	Andrew Differ	
RR-1638	Andrew Flack	
RR-1639	Andrew Melville	
RR-1640	Andrew Ward	
RR-1641	Anja Bruckner	
RR-1642	Ann Bradbury	
RR-1643	Ann Teague	
RR-1644	Anne Lindup	
RR-1645	Anthony Bicknell	
RR-1646	Anthony Bridges	
RR-1647	Anton Tagunov	
RR-1648	Arthur Kincaid	
RR-1649	Asha Lodh	
RR-1650	Barbara Saville	
RR-1651	Barry Garwood	
RR-1652	Basharat Ali	
RR-1653	Ben Parker-Wright	
RR-1654	Brian Edwards	
RR-1655	Brian Inglis	
RR-1656	Brian Reid	
RR-1657	Brian Schaffer	
RR-1658	Brian Thompson	
RR-1659	Bridget Fox	
RR-1660	C Chapman	
RR-1661	Chris Todd	Campaign for Better Transport
RR-1662	Carl Burrows	
RR-1663	Carly Bannister	
RR-1664	Caroline Price	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1665	Carolyn Sara Beckingham	
RR-1666	Charles David Foulstone	
RR-1667	Charlotte Law	
RR-1668	Charlotte Yeomans	
RR-1669	Chris Bullen	
RR-1670	Chris Chinn	
RR-1671	Chris Crean	
RR-1672	Chris Lowe	
RR-1673	Christine Bardsley	
RR-1674	Christopher Sauvarin	
RR-1675	Christopher Wain	
RR-1676	Claire Kime	
RR-1677	Claire Mellish	
RR-1678	Claire Nahmad	
RR-1679	Colin Jones	
RR-1680	Colleen I Spalding	
RR-1681	Dr Mike Heyworth MBE	Council for British Archaeology
RR-1682	John Rollo Maughfling	Council of British Druid Orders (CoBDO)
RR-1683	Becky Collier	CPRE South West
RR-1684	Dan Lawrence	
RR-1685	Daniel J Teague	
RR-1686	Daniel Miller	
RR-1687	Darrielle Devese Jenkins	
RR-1688	Dave Wallace	
RR-1689	David Atkin	
RR-1690	David Barthram	
RR-1691	David Boston	
RR-1692	David Ford	
RR-1693	David Holland Smith	
RR-1694	David Thalenberg	
RR-1695	Davinia Baldwin	
RR-1696	Davy King	
RR-1697	Debi Lysaght	
RR-1698	Debi Richens	
RR-1699	Deborah Lee	
RR-1700	Deborah Walsh	
RR-1701	Denise Long	
RR-1702	Dennis Price	
RR-1703	Derek Flockton	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1704	Derek Harris	
RR-1705	Dilys Guildford	
RR-1706	Dr Caroline Hawkyard	
RR-1707	Dr Dave Buxton	
RR-1708	Dr Ian Magrath	
RR-1709	Dr John Collier	
RR-1710	Dr Michele Wollstonecroft	
RR-1711	Dr Tim Marshall	
RR-1712	Dr. Lauren McIntyre	
RR-1713	Duncan Burwood	
RR-1714	Duncan Cameron McGill	
RR-1715	Edmond Deighton	
RR-1716	Elaine Bailey	
RR-1717	Eleanor Chandler	
RR-1718	Elisabeth Edwards	
RR-1719	Elizabeth Hankins	
RR-1720	Elizabeth Lodh	
RR-1721	Elton Barker	
RR-1722	Emma Hodgson	
RR-1723	Emma Summers	
RR-1724	Emma Tilbury	
RR-1725	Freeths LLP	English Heritage
RR-1726	James Taylor	Esso Petroleum Company, Limited
RR-1727	Ewen Leveroni	
RR-1728	Frances Green	
RR-1729	Frances Howard-Gordon	
RR-1730	Francis Arthur Edwards	
RR-1731	Francis Philip James Stoner	
RR-1732	Mike Birkin	Friends of the Earth
RR-1733	Gaynor Leake	
RR-1734	Gemma Allerton	
RR-1735	Gerard Hales	
RR-1736	Gill Stride	
RR-1737	Gillian Cockwill	
RR-1738	Gillian McAlister	
RR-1739	Graham Downie	
RR-1740	Ruth Manvell	Great Bustard Group
RR-1741	John Lippiatt	Green Lane Association (Wiltshire area)
RR-1742	Diana Mallinson	Green Lanes Environmental Action Movement

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
		(GLEAM)
RR-1743	Gwyneth Jones	
RR-1744	H. Wright	
RR-1745	Ian Harrison	Heart of the South West Local Enterprise Partnership
RR-1746	Heidi Rogers	
RR-1747	Helen Marriott	
RR-1748	Helen Taylor	
RR-1749	Henry Dashwood	
RR-1750	Hilary Greene	
RR-1751	Ian Broom	
RR-1752	Ian Clarke	
RR-1753	Ingrid Eglese	
RR-1754	Susan Denyer	International Council on Monuments and Sites UK (ICOMOS-UK)
RR-1755	Isabella Lazlo	
RR-1756	J Bradley	
RR-1757	Jack Cox	
RR-1758	James Gunter	
RR-1759	James Hamer	
RR-1760	James Houghton	
RR-1761	James MacAonghus	
RR-1762	James McDonald	
RR-1763	Jane Willmore	
RR-1764	Jennifer Kreit	
RR-1765	Jennifer Laute	
RR-1766	Jilaine M Callison	
RR-1767	Jinny Fisher	
RR-1768	Joanna Wright	
RR-1769	Joanne Edwards	
RR-1770	Joanne Underwood	
RR-1771	John Repsch	
RR-1772	Jon V Ziemba	
RR-1773	Jonathan Lambert	
RR-1774	Jonathan Mann	
RR-1775	Joshua Knowles	
RR-1776	Julie Louise Wilkinson	
RR-1777	Julie Trevellick	
RR-1778	Juliet Chaplin	
RR-1779	K Bastin	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1780	Karen Meager	
RR-1781	Kate Forwood	
RR-1782	Kate Simpson	
RR-1783	Katharine Thomas	
RR-1784	Katherine Challis	
RR-1785	Kim Adoue	
RR-1786	Kim Iannucci	
RR-1787	Kirsten Espensen	
RR-1788	Lara Williams	
RR-1789	Layla Fowler	
RR-1790	Leaynn Swateridge	
RR-1791	Les Cloutman	
RR-1792	Laws and Fiennes	Lincoln College
RR-1793	Lionel Welch	
RR-1794	Lisette MacKenzie	
RR-1795	Lois Fry	
RR-1796	Louise Hobson	
RR-1797	Madeleine Atkinson	
RR-1798	Marcus Stafford	
RR-1799	Marguerite McGinty	
RR-1800	Maria Edge	
RR-1801	Marija Currell	
RR-1802	Mark Allen	
RR-1803	Mark Byrne	
RR-1804	Mark Hallworth	
RR-1805	Mark Lipski	
RR-1806	Martin Stephens	
RR-1807	Mary Branson	
RR-1808	Matthew DeHaven	
RR-1809	Melanie J Hazen	
RR-1810	Michael Blyth	
RR-1811	Michael Devlin	
RR-1812	Michael Emanuel Rosenbloom	
RR-1813	Michael Hinton	
RR-1814	Michael Nelson Johnson	
RR-1815	Michele McIntyre	
RR-1816	Mike Tregent	
RR-1817	Moira Gomes	
RR-1818	Mr Andrew Bonnet	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1819	Mr James Phethean	
RR-1820	Mrs Elizabeth Fairweather	
RR-1821	Mrs Irene Joan Byrne	
RR-1822	Mrs Joy Shallcross	
RR-1823	Mrs Sarah Frances Collins	
RR-1824	Ms Elizabeth Murfitt	
RR-1825	Ms lawrence	
RR-1826	Ms Lucia Nixon	
RR-1827	Myfanwy Lloyd Jones	
RR-1828	Myfanwy Millward	
RR-1829	Nadine Holt	
RR-1830	Nigel Parkin	
RR-1831	Nigel Wright	
RR-1832	Nina Murdoch	
RR-1833	Oliver Harwood	
RR-1834	Francis Stoner	Open Access to Stonehenge (OAtS)
RR-1835	P Addison	
RR-1836	Patrick Duncan, PhD	
RR-1837	Paul Davis	
RR-1838	Paul Gossage	
RR-1839	Paul Jennings	
RR-1840	Paul Timlett	
RR-1841	Paul Woodham	
RR-1842	Paula e diment	
RR-1843	Pauline King	
RR-1844	Christopher Woods	Peak District Green Lanes Alliance
RR-1845	Peter Crowem	
RR-1846	Peter Jones	
RR-1847	Phil Manning	
RR-1848	philip matthews	
RR-1849	Rachel Stott	
RR-1850	Rhidian Stoddart	
RR-1851	Richard L Sweetnam	
RR-1852	Richard Lilley	
RR-1853	Richard Roberts	
RR-1854	Rob Donovan	
RR-1855	Robert Canner	
RR-1856	Robert Hunt-Grubbe	
RR-1857	Robert Wakefield	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1858	Roberta Brockman	
RR-1859	Robin Bainton	
RR-1860	Robin Wrigley	
RR-1861	Rod Archard	
RR-1862	Roger Plenty	
RR-1863	Rosalind Daws	
RR-1864	BNP Paribas	Royal Mail Group
RR-1865	Ruth Lerew	
RR-1866	S Slater	
RR-1867	Samantha Cutlan	
RR-1868	Sandra Alexander	
RR-1869	Sandra White	
RR-1870	Sara Bryant	
RR-1871	Sarah Bowles	
RR-1872	Sarah Rapley	
RR-1873	Sean Barclay	
RR-1874	Sheila Gale	
RR-1875	Sian Griffiths	
RR-1876	Simon Larn	
RR-1877	Simon Marshall	
RR-1878	Sion Elis Williams	
RR-1879	Dr Rebecca Tomlin	Society of Antiquaries of London
RR-1880	Sonia Miller	
RR-1881	Sophie Latter	
RR-1882	Steph Bell	
RR-1883	Steve Hill	
RR-1884	Steve Thomas	
RR-1885	Stuart John Wilford	
RR-1886	Sue Marcus	
RR-1887	Sue O'Sullivan	
RR-1888	Sue Shepherd-Cross	
RR-1889	Susan Cullip	
RR-1890	Susan Graney	
RR-1891	Susan Marshall	
RR-1892	Susan Sutton	
RR-1893	Tanya Wills	
RR-1894	Terry Sessford	
RR-1895	Laura Blake	Thames Crossing Action Group
RR-1896	Susan Rogers (Hon Secretary)	The Avebury Society

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1897	Phillip McMahon	The Historic Buildings and Monuments Commission for England
RR-1898	Kate Fielden	The Stonehenge Alliance
RR-1899	Theresa Waterhouse	
RR-1900	Thomas Bachrach	
RR-1901	Thomas T. Gough	
RR-1902	Tim Mullett	
RR-1903	Tina Johnston	
RR-1904	Tom Owen	
RR-1905	Tony Wingrove	
RR-1906	Tracy Lee	
RR-1907	John Vannufel	Trail Riders Fellowship
RR-1908	Trevad Griffin	
RR-1909	Trevor Grant	
RR-1910	Valerie Wright	
RR-1911	Vanessa Rigg	
RR-1912	Vanita Eden	
RR-1913	Vicky Chapman	
RR-1914	Vincent Haigh	
RR-1915	Wayne Hepworth	
RR-1916	Wendy Birse	
RR-1917	Wendy Davis	
RR-1918	Wessex Regionalist - The Party for Wessex	
RR-1919	Will Knocker	
RR-1920	William Henry	
RR-1921	Zoe Smith	
RR-1922	Zohreh Adle	
RR-1923	Dr. Christopher Gillham	A36/A350 Corridor Alliance
RR-1924	Adam Scott	
RR-1925	Adam Spring	
RR-1926	Adam Stevenson	
RR-1927	Adam Webb	
RR-1928	Adam Webber	
RR-1929	Adam Woods	
RR-1930	Adrian Couper	
RR-1931	Aimee Davey	
RR-1932	Alasdair Cameron	
RR-1933	Alastair Gunn	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1934	Alex Crowe	
RR-1935	Alex Rose	
RR-1936	Alex Traves	
RR-1937	Alexander Iain Siantonas	
RR-1938	Alexander van Tuyl	
RR-1939	Ali Ansari	
RR-1940	Alice Gem	
RR-1941	Alison Jones	
RR-1942	Amanda Barnett	
RR-1943	Amanda Devaney	
RR-1944	Amanda Marshall	
RR-1945	Amanda Murdoch	
RR-1946	Amelia ap Ellis	
RR-1947	Andrew Rhind-Tutt	Amesbury Museum and Heritage Trust
RR-1948	Amy Cheetham	
RR-1949	Andrew Day	
RR-1950	Andrew Hall	
RR-1951	Andrew Mallett	
RR-1952	Andrew Miller	
RR-1953	Andrew Perkins	
RR-1954	Andrew Rhind-Tutt	
RR-1955	Andrew Roy Saunders	
RR-1956	Andrew Stone	
RR-1957	Andrew Varley	
RR-1958	Angela Carr	
RR-1959	Angela Shaw	
RR-1960	Anne Delaney	
RR-1961	Anne Patterson	
RR-1962	Anne Somers	
RR-1963	Annette Brown	
RR-1964	Annie Hurn	
RR-1965	Annie Wood	
RR-1966	Ant Hood	
RR-1967	Anthony Hodson-Curran	
RR-1968	Anthony Rowland	
RR-1969	Antoinette Everts	
RR-1970	Ashton Stansfield	
RR-1971	Barbara Slaska	
RR-1972	Barrie Hargrove	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-1973	Becky Allen	
RR-1974	Ben Barker	
RR-1975	Benjamin Davy	
RR-1976	Benson Dowler	
RR-1977	Ben Myerscough	Berwick Down Limited
RR-1978	Anika Lange	Berwick St James Community Interest Group
RR-1979	Beverley McGuinness	
RR-1980	Ben Myerscough	Biddesden House Farm Partnership
RR-1981	Bob Doyle	
RR-1982	Bob Trubshaw	
RR-1983	Bodhi Bear	
RR-1984	Bradley Phipps	
RR-1985	Brian Webb	
RR-1986	Brian Willis	
RR-1987	Carole Tyrrell	
RR-1988	Caroline Boileau	
RR-1989	Caroline Hole	
RR-1990	Caroline Roberts	
RR-1991	Caroline Smith	
RR-1992	Catherine Butler	
RR-1993	Catherine Noyce	
RR-1994	Charles Peyton	
RR-1995	Charlie Horten-Middleton	
RR-1996	Chris Hawkes	
RR-1997	Chris Martin	
RR-1998	Chris Pickard	
RR-1999	Christine Clark	
RR-2000	Christine Eborall	
RR-2001	Christine MacLeod	
RR-2002	Christopher Green	
RR-2003	Christopher Guyver	
RR-2004	Christopher Stone	
RR-2005	Claire Gregory	
RR-2006	Claire Heron	
RR-2007	Clare E. Smith	
RR-2008	Clare Shepherd	
RR-2009	Conor Niall O'Luby	
RR-2010	Corinne Fox	
RR-2011	Corrine Edwards	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-2012	Craig Penfield	
RR-2013	Danielle Kifah	
RR-2014	Dave	
RR-2015	David Bailey	
RR-2016	David Brunt	
RR-2017	David Butcher	
RR-2018	David Charles Rowan	
RR-2019	David Collard	
RR-2020	David Corney	
RR-2021	David Field	
RR-2022	David Mitchell	
RR-2023	David Ryan	
RR-2024	David Scott	
RR-2025	David Seilly	
RR-2026	David Williams	
RR-2027	Dawn Green	
RR-2028	Debbie Kilroy	
RR-2029	Deborah Gove	
RR-2030	Deborah Marson	
RR-2031	Deborah Osband	
RR-2032	Dee Terry	
RR-2033	Dee Twentyman	
RR-2034	Deiniol Morgan	
RR-2035	Denise O Neil	
RR-2036	Enid Williams	Department for Digital, Culture, Media and Sport
RR-2037	Diana Venner	
RR-2038	Diane Mocerri	
RR-2039	Donna Hanson	
RR-2040	Donna Stevens	
RR-2041	Douglas Young	
RR-2042	Dr C.A. Shell	
RR-2043	Dr Charles Goodson-Wickes, DL	
RR-2044	Dr John Tattersall	
RR-2045	Dr Mike Dines	
RR-2046	Dr Sandy Gerrard	
RR-2047	Dr Sophie Hay	
RR-2048	Dr. Tom Booth	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-2049	Ed Barnett	
RR-2050	Edward Curran	
RR-2051	Elaine Locke	
RR-2052	Eleanor Lakew	
RR-2053	Elisabeth Kelly	
RR-2054	Elise Benjamin	
RR-2055	Elizabeth James	
RR-2056	Elizabeth Darracott	
RR-2057	Ellen van der Bij	
RR-2058	Emily Kitchen	
RR-2059	Emily Lequesne	
RR-2060	Michael Holm	Environment Agency
RR-2061	Erin Sanna	
RR-2062	Ewan Hayes	
RR-2063	Fae Starshine	
RR-2064	Fiona Cregan	
RR-2065	Frances Parrish	
RR-2066	Frank Courtney	
RR-2067	Gail-Nina Anderson	
RR-2068	Gareth Lowe	
RR-2069	Gareth Morris	
RR-2070	Gareth Pope	
RR-2071	Gary Bavin	
RR-2072	Gavin Smith	
RR-2073	Gerard Charles	
RR-2074	Gillian Hawes	
RR-2075	Gillian Swanton BA, DipAdEd, FSA	
RR-2076	Angela Grant	Gorsedd of Bards of Cor Gawr - Gorsedd Beirdd Cŵr y Cewri
RR-2077	Greg Richards	
RR-2078	Gregory Jotham	
RR-2079	Hamish Soutar	
RR-2080	Hannah Houghton-Berry	
RR-2081	Harald Rauser	
RR-2082	Harry Baker	
RR-2083	Hazel Whitefoot	
RR-2084	Hazel Young	
RR-2085	Helen Compton	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-2086	Helen Hatt	
RR-2087	Helen Hill	
RR-2088	Rachel Hosier	Helen Hosier
RR-2089	Helen Jennings	
RR-2090	Helen Middleton	
RR-2091	Helene Williams	
RR-2092	Hester Schofield	
RR-2093	Humphrey Sherwood	
RR-2094	Iain Phillips	
RR-2095	Ian Bee	
RR-2096	Ian Bunce	
RR-2097	Ian Forster	
RR-2098	Ian Holloway	
RR-2099	Ian Louis Molnar	
RR-2100	Ian Rawlins	
RR-2101	Peter George Beckwith	Independent Festival and Event Assessor
RR-2102	Ingrid ODonnell	
RR-2103	Isabel Adomakoh Young	
RR-2104	Ivan Gosling	
RR-2105	J Pope	
RR-2106	J Stedman	
RR-2107	J Yeates	
RR-2108	Fowler Fortescue	J&M Turner and Son
RR-2109	Fowler Fortescue	J.M Stratton & Co
RR-2110	J.M. Doude van Troostwijk	
RR-2111	Jack Wheeler	
RR-2112	Jackie Whitelaw	
RR-2113	Jacqueline Milton	
RR-2114	Jacqui Selby	
RR-2115	Jade Overington	
RR-2116	Jake Townson	
RR-2117	James Burns	
RR-2118	James Butcher	
RR-2119	James Mackay	
RR-2120	James Nye	
RR-2121	James P Knowles	
RR-2122	James Rann	
RR-2123	Andy Rhind-Tutt	James Rhind-Tutt
RR-2124	James Rodgers	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-2125	James Sundquist	
RR-2126	James Trimmer	
RR-2127	James Wallis	
RR-2128	James Wheildon	
RR-2129	Jamie Muir	
RR-2130	Jan Ashdown	
RR-2131	Jane Davies	
RR-2132	Janet Barfield	
RR-2133	Janice Phillips	
RR-2134	Jasmin Hosier	
RR-2135	Jason Mosley	
RR-2136	Jayne Brearley	
RR-2137	Jayne Davis	
RR-2138	Jean Seddon	
RR-2139	Jem Edward	
RR-2140	Jennifer	
RR-2141	Jeremy Aronstam	
RR-2142	Jeremy Dittmer	
RR-2143	Jeremy Renals	
RR-2144	Jeremy Wiltshire	
RR-2145	Jessica Butt	
RR-2146	Jill Gough	
RR-2147	Jo Kneale	
RR-2148	Joan Harris	
RR-2149	Joanna Bell	
RR-2150	Joanna Derrick	
RR-2151	Joanna Morgan	
RR-2152	John Payne	
RR-2153	John Pettitt	
RR-2154	John Porterr	
RR-2155	John Raymond Lawton	
RR-2156	Jon Eldude	
RR-2157	Jonathan Abbott	
RR-2158	Jonathan Allen	
RR-2159	Jonathan Milton	
RR-2160	Jonathan Morris	
RR-2161	Josiah Aden	
RR-2162	Joy Harvey	
RR-2163	Joy Youngman	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-2164	Judith De St Croix	
RR-2165	Judith Selman	
RR-2166	Julie Boreham	
RR-2167	K Smooch	
RR-2168	Karl Mast	
RR-2169	Kate Annette	
RR-2170	Kate Babington	
RR-2171	Kate Callaghan	
RR-2172	Katheryn Thompson	
RR-2173	Keith Bradbury	
RR-2174	Kelly Jamieson	
RR-2175	Kerry McGee	
RR-2176	Kiri Hydr	
RR-2177	Kyla Morris	
RR-2178	Edward Bailey	Lake Farm Partnership
RR-2179	Lance Ames	
RR-2180	Lara Colenso	
RR-2181	Laura Boeva	
RR-2182	Laura-Beth Dawson	
RR-2183	Laurence Cox	
RR-2184	Lee Brooker	
RR-2185	Lee Farmer	
RR-2186	Lene Thorbjornsen	
RR-2187	Liam Carr	
RR-2188	Liam McKenna	
RR-2189	Linda Fowler	
RR-2190	Lisa Leddiccoat	
RR-2191	Lisa Nelson	
RR-2192	Lone Bang	
RR-2193	Lorna Ritchie	
RR-2194	Lorraine Tighe	
RR-2195	Louise Lambe	
RR-2196	Lucy Gordon-Smith	
RR-2197	Lucy Milton	
RR-2198	Lynda Gibson	
RR-2199	Lynn Wilson	
RR-2200	M Murison	
RR-2201	Carter Jonas LLP	M&R Hosier
RR-2202	M. Lyons	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-2203	Maddie Ryan	
RR-2204	Maggi Noke	
RR-2205	Maire Ni Chathasaigh	
RR-2206	Margaret Garriott	
RR-2207	Marion Malcher	
RR-2208	Mark Allum	
RR-2209	Mark Bush	
RR-2210	Mark Glover	
RR-2211	Mark Pilkington	
RR-2212	Mark Sharon	
RR-2213	Mark Waugh	
RR-2214	Martin Myers	
RR-2215	Martin Oliver	
RR-2216	Mary Evans	
RR-2217	Mary Foster	
RR-2218	Matthew Allison	
RR-2219	Matthew Benson	
RR-2220	Rachel Hosier	Max Hosier
RR-2221	Mellissa Nixon	
RR-2222	Michael Cahill	
RR-2223	Michael Deacon	
RR-2224	Michael Dunphy	
RR-2225	Michael Storer	
RR-2226	Michael Victor Bonett	
RR-2227	Michael Wood	
RR-2228	Michaela Phillips	
RR-2229	Mike Chappell	
RR-2230	Miranda Wilson	
RR-2231	Miriam Shellabear	
RR-2232	Miss C Farley	
RR-2233	Molly Scott Cato MEP	
RR-2234	Mr D F Doherty	
RR-2235	Mr John Morris	
RR-2236	Mr L Freear	
RR-2237	Howard Smith MRICS	Mr P J Sawkill
RR-2238	Mr Patrick Regan	
RR-2239	MR Richard V Spears	
RR-2240	Howard Smith MRICS	MR STEPHEN MOORE T/A R J MOORE & SONS

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-2241	Mr Terry Scales	
RR-2242	Mr. Sam Clements	
RR-2243	Mrs Joy Wagstaff	
RR-2244	Mrs Judith Beal	
RR-2245	Mrs Kerry Gaskin	
RR-2246	Mrs Sheridan Dingle	
RR-2247	Mrs. Stephanie Margaret Lodge	
RR-2248	N Tucker	
RR-2249	Naomi Fountain	
RR-2250	Naomi Todd	
RR-2251	Natasha Garside	
RR-2252	Louise Staples	National Farmers Union
RR-2253	Charles Routh	Natural England
RR-2254	Nelson Crockett	
RR-2255	Neo Rose	
RR-2256	Nicholas Baylis	
RR-2257	Nicholas Binns	
RR-2258	Nicky Galliers	
RR-2259	Nicola Everill	
RR-2260	Nicola Nama	
RR-2261	Nigel Rowley	
RR-2262	Norman David Hunter	
RR-2263	Oliver Aylwin	
RR-2264	Ollie Glanvill	
RR-2265	P M Scrayfield	
RR-2266	Pam Chapman	
RR-2267	Pamela Ross	
RR-2268	Pascale Stacey	
RR-2269	Paul Anthony Mackie	
RR-2270	Paul Harriott	
RR-2271	Paul Horrobin	
RR-2272	Paul Mitchell	
RR-2273	Paul Shorter	
RR-2274	Pavlin Boev	
RR-2275	Mandy Pearse	Peninsula Transport Sub-national Transport Body
RR-2276	Pete Glastonbury	
RR-2277	Peter Freeman	
RR-2278	Peter Jackson	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-2279	Peter James	
RR-2280	Peter Munford	
RR-2281	Peter Warren	
RR-2282	Peter Wright	
RR-2283	Peter Wrighton	
RR-2284	Philip Whitehead	
RR-2285	Pippa Sweet	
RR-2286	Professor Charles Foster	
RR-2287	Rachael Sims	
RR-2288	Rachel	
RR-2289	Rachel Holland	
RR-2290	Rafe Robbins	
RR-2291	Rebecca Cave	
RR-2292	Rebecca Gelernter	
RR-2293	Rebecca Rhind-Tutt	
RR-2294	Richard Bartosz	
RR-2295	Richard Drew	
RR-2296	Richard Gaskin	
RR-2297	Richard Stead	
RR-2298	Robert Goldspink	
RR-2299	Robin Carroll	
RR-2300	Ros Newnham	
RR-2301	Rosemary Bond	
RR-2302	Roy Matthews	
RR-2303	Rupert Hosier	
RR-2304	Russell Hogg	
RR-2305	Ruth Halliwell	
RR-2306	Ruth Manvell	
RR-2307	Sally Clarke	
RR-2308	Nick Measham	Salmon & Trout Conservation
RR-2309	Sam Taylor	
RR-2310	Sandra Buttigieg	
RR-2311	Sandra Lane	
RR-2312	Sarah Meyer	
RR-2313	Sarah Milteer	
RR-2314	Sarah Mitchell	
RR-2315	Sarah Sweet	
RR-2316	Sharon Groom	
RR-2317	Sian Forsythe	

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-2318	Sian Waters	
RR-2319	Simon Crook	
RR-2320	Simon Kemp	
RR-2321	Simon Mason	
RR-2322	Simon Wynne	
RR-2323	Steeve Oberzusser	
RR-2324	Stephen Butt	
RR-2325	Stephen Loughnan	
RR-2326	Stephen Molyneaux	
RR-2327	Stephen Williams	
RR-2328	Steven Hodges	
RR-2329	Stonehenge and Avebury WHS	
RR-2330	Stuart Jeffery	
RR-2331	Stuart McTeare	
RR-2332	Sue Butler	
RR-2333	Sue Preston	
RR-2334	Susan Baker	
RR-2335	Susan Chapman	
RR-2336	Susan Francis	
RR-2337	Susan Harrison	
RR-2338	Sushil Umrao	
RR-2339	Suzannah Jenkins	
RR-2340	Suzanne Ormond	
RR-2341	Suzy parker	
RR-2342	T. Lockwood	
RR-2343	Terry Young	
RR-2344	Mark Funnell	The National Trust
RR-2345	Fowler Fortescue	The Turner Family
RR-2346	Thomas Edwards	
RR-2347	Thomas Rogerson	
RR-2348	Tony Harry-Williams	
RR-2349	Tony Weeks	
RR-2350	Tony White	
RR-2351	Tracey Wilson	
RR-2352	Trudy Turrell	
RR-2353	Dr Thomas Daffern	Truth and Reconciliation Commission for Stonehenge
RR-2354	Fowler Fortescue	TURNER (WINTERBOURNE STOKE) LIMITED

Relevant Representation Reference Number	Relevant Representation Name	On behalf of or representing...
RR-2355	Blick Mead Project	University of Buckingham
RR-2356	Vanessa Bicknell	
RR-2357	Vicki Steward	
RR-2358	Victoria Hill	
RR-2359	Victoria Lane	
RR-2360	Vikki French	
RR-2361	Warren Marsh	
RR-2362	Wendy Darling	
RR-2363	Hampshire Avon Catchment Partnership	Wessex Chalk Stream and Rivers Trust
RR-2364	WH Bottomley	
RR-2365	Parvis Khansari	Wiltshire Council
RR-2366	Tom Davis	Wiltshire Fishery Association
RR-2367	Zoe Tees	
RR-2368	Zoe Wilkins	
RR-2369	Zoe Young	
RR-2370	Sophia Smith	
RR2371AS	Lieutenant Colonel G.W. Parker. O.B.E	
RR2372AS	Tom Hoeksma	
RR2373AS	Stonehenge Alliance	
RR2374AS	Susan Blackstone	
RR2375AS	Tamara Rundle	

Appendix B - Alternatives

Summary of Comment Received	Relevant Representation Reference Number
A more imaginative solution is needed.	RR-0036 , RR-0337 , RR-0085 , RR-0039 , RR-0088 , RR-0044 , RR-0122 , RR-0114 , RR-0124 , RR-0064 , RR-0055 , RR-0096 , RR-0347 , RR-0129 , RR-0069 , RR-0108 , RR-0047 , RR-0072 , RR-0432 , RR-0398 , RR-0453 , RR-0641 , RR-0784 , RR-1331 , RR-1163 , RR-1197 , RR-1143 , RR-1374 , RR-1145 , RR-1173 , RR-1385 , RR-1266 , RR-1407 , RR-1427 , RR-1448 , RR-1434 , RR-1541 , RR-0963 , RR-1002 , RR-1017 , RR-1034 , RR-1087 , RR-1345 , RR-1221 , RR-0024 , RR-1624 , RR-1658 , RR-1402 , RR-1633 , RR-1778 , RR-1870 , RR-1739 , RR-1628 , RR-2315 , RR-1672 , RR-1551 , RR-1611 , RR-2064 , RR-2139 , RR-1996 , RR-2002 , RR-2026 , RR-1943

Appendix C – Needs and Benefits

Summary of Comment Received	Relevant Representation Reference Number
The Scheme does not offer value for money.	RR-0025 , RR-0031 , RR-0029 , RR-0034 , RR-0134 , RR-0106 , RR-0291 , RR-0142 , RR-0208 , RR-0223 , RR-0201 , RR-0230 , RR-0257 , RR-0483 , RR-0625 , RR-0504 , RR-0455 , RR-0402 , RR-0656 , RR-0667 , RR-0777 , RR-1205 , RR-1257 , RR-1278 , RR-1303 , RR-1261 , RR-1249 , RR-1302 , RR-1307 , RR-1338 , RR-1469 , RR-1495 , RR-0921 , RR-0954 , RR-0964 , RR-0978 , RR-1005 , RR-1011 , RR-1024 , RR-1031 , RR-1121 , RR-1248 , RR-1621 , RR-1616 , RR-1598 , RR-1605 , RR-1834 , RR-1716 , RR-1683 , RR-1694 , RR-1654 , RR-1878 , RR-1645 , RR-1856 , RR-1860 , RR-1890 , RR-1831 , RR-1789 , RR-1838 , RR-1680 , RR-1661 , RR-1971 , RR-2054 , RR-2214 , RR-2193 , RR-2139 , RR-2288 , RR-2133 , RR-2306 , RR-2134 , RR-1950 , RR-2181 , RR-2201 , RR-2088 , RR-2220
General objection to / concerns about the Scheme.	RR-0005 , RR-0018 , RR-0004 , RR-0031 , RR-0027 , RR-0029 , RR-0282 , RR-0278 , RR-0299 , RR-0184 , RR-0304 , RR-0268 , RR-0079 , RR-0313 , RR-0157 , RR-0127 , RR-0116 , RR-0291 , RR-0088 , RR-0150 , RR-0254 , RR-0335 , RR-0320 , RR-0289 , RR-0114 , RR-0312 , RR-0208 , RR-0285 , RR-0207 , RR-0214 , RR-0293 , RR-0181 , RR-0183 , RR-0177 , RR-0159 , RR-0226 , RR-0128 , RR-0173 , RR-0153 , RR-0240 , RR-0096 , RR-0329 , RR-0152 , RR-0325 , RR-0280 , RR-0117 , RR-0129 , RR-0103 , RR-0182 , RR-0283 , RR-0170 , RR-0277 , RR-0322 , RR-0158 , RR-0090 , RR-0454 , RR-0567 , RR-0555 , RR-0456 , RR-0554 , RR-0594 , RR-0457 , RR-0539 , RR-0588 , RR-0502 , RR-0600 , RR-0546 , RR-0568 , RR-0596 , RR-0473 , RR-0571 , RR-0574 , RR-0487 , RR-0508 , RR-0449 , RR-0581 , RR-0504 , RR-0503 , RR-0592 , RR-0524 , RR-0580 , RR-0355 , RR-0451 , RR-0559 , RR-0421 , RR-0512 , RR-0598 , RR-0375 , RR-0583 , RR-0455 , RR-0576 , RR-0450 , RR-0563 , RR-0577 , RR-0582 , RR-0590 , RR-0366 , RR-0585 , RR-0440 , RR-0356 , RR-0654 , RR-0681 , RR-0711 , RR-0688 , RR-0698 , RR-0667 , RR-0630 , RR-0677 , RR-0701 , RR-0666 , RR-0755 , RR-0739 , RR-0729 , RR-0756 , RR-0783 , RR-0781 , RR-0764 , RR-0780 , RR-0828 , RR-0839 , RR-0827 , RR-0824 , RR-0848 , RR-0845 , RR-0847 , RR-1272 , RR-1295 , RR-1347 , RR-1306 , RR-1341 , RR-1300 , RR-1257 , RR-1360 , RR-1278 , RR-1303 , RR-1366 , RR-1359 , RR-1210 , RR-0281 , RR-1232 , RR-1298 , RR-1192 , RR-1349 , RR-1343 , RR-1235 , RR-1394 , RR-1355 , RR-1229 , RR-1317 , RR-1242 , RR-1193 , RR-1391 , RR-1180 , RR-1146 , RR-1244 , RR-1230 , RR-1296 , RR-1254 , RR-1175 , RR-1172 , RR-1368 , RR-1285 , RR-1234 , RR-1392 , RR-1233 , RR-1322 , RR-1277 , RR-1526 , RR-1413 , RR-1501 , RR-1437 , RR-1509 , RR-1452 , RR-1435 , RR-1513 , RR-1462 , RR-1493 , RR-1428 , RR-1516 , RR-1475 , RR-1443 , RR-1414 , RR-1454 , RR-1579 , RR-1552 , RR-1576 , RR-1550 , RR-1600 , RR-1607 , RR-0911 , RR-0935 , RR-0926 , RR-0939 , RR-0949 , RR-0947 , RR-0966 , RR-0981 , RR-0976 , RR-0985 , RR-0988 , RR-0978 , RR-0993 , RR-0996 , RR-0982 , RR-0987 , RR-1005 , RR-1007 , RR-1012 , RR-1030 , RR-1021 , RR-1023 , RR-1042 , RR-1036 , RR-1045 , RR-1044 , RR-1056 , RR-1054 , RR-1058 , RR-1079 , RR-1126 , RR-1119 , RR-1110 , RR-1123 , RR-1087 , RR-1098 , RR-1090 , RR-1071 , RR-1140 , RR-1080 , RR-1106 , RR-1127 , RR-1118 , RR-1091 , RR-1063 , RR-1108 , RR-1346 , RR-0851 , RR-0870 , RR-0883 , RR-1189 , RR-1208 , RR-1356 , RR-1153 , RR-1571 , RR-1599 , RR-1563 , RR-1562 , RR-1577 , RR-1625 , RR-1544 , RR-1809 , RR-1852 , RR-1716 , RR-1920 , RR-1633 , RR-1802 , RR-1859 , RR-1880 , RR-1747 , RR-1796 , RR-1878 , RR-1813 , RR-1808 , RR-1914 , RR-1799 , RR-1744 , RR-1709 , RR-1800 , RR-1837 , RR-1627 , RR-1774 , RR-1895 , RR-1824 , RR-

Summary of Comment Received	Relevant Representation Reference Number
	0027 , RR-1795 , RR-1863 , RR-1881 , RR-1860 , RR-1761 , RR-1760 , RR-1913 , RR-1636 , RR-2141 , RR-2210 , RR-2149 , RR-2297 , RR-1734 , RR-1631 , RR-1849 , RR-1848 , RR-1876 , RR-1790 , RR-RR-1663 , RR-1640 , RR-1789 , RR-1711 , RR-1828 , RR-1877 , RR-1756 , RR-1750 , RR-1680 , RR-1748 , RR-1770 , RR-1946 , RR-2014 , RR-2028 , RR-2302 , RR-1944 , RR-2146 , RR-2135 , RR-2291 , RR-2217 , RR-2166 , RR-2041 , RR-2307 , RR-2115 , RR-2037 , RR-2260 , RR-2215 , RR-2163 , RR-2214 , RR-2125 , RR-1861 , RR-1763 , RR-2092 , RR-2335 , RR-2304 , RR-2176 , RR-2113 , RR-2321 , RR-2317 , RR-2205 , RR-2199 , RR-2226 , RR-2059 , RR-2183 , RR-2188 , RR-2274 , RR-2178 , RR-1996 , RR-2068 , RR-2207 , RR-2140 , RR-2192 , RR-2169 , RR-2112 , RR-2094 , RR-2296 , RR-2248 , RR-2049 , RR-2091 , RR-2219 , RR-2265 , RR-2238 , RR-2065 , RR-2313 , RR-2224 , RR-2294 , RR-2299 , RR-2225 , RR-2300 , RR-2306 , RR-2098 , RR-2206 , RR-2056 , RR-2282 , RR-2280 , RR-2195 , RR-2147 , RR-1932 , RR-1947 , RR-1945 , RR-1960 , RR-2286 , RR-1928 , RR-2233 , RR2372AS
Scheme is a hostile act to those who hold the area sacred.	RR-0020 , RR-0005 , RR-0010 , RR-0059 , RR-0276 , RR-0193 , RR-0247 , RR-0184 , RR-0195 , RR-0038 , RR-0295 , RR-0191 , RR-0285 , RR-0207 , RR-0165 , RR-0123 , RR-0169 , RR-0251 , RR-0218 , RR-0226 , RR-0175 , RR-0215 , RR-0197 , RR-0328 , RR-0075 , RR-0405 , RR-0591 , RR-0432 , RR-0551 , RR-0571 , RR-0615 , RR-0430 , RR-0460 , RR-0434 , RR-0509 , RR-0429 , RR-0592 , RR-0518 , RR-0557 , RR-0431 , RR-0717 , RR-0714 , RR-0667 , RR-0679 , RR-0677 , RR-0670 , RR-0713 , RR-0757 , RR-0746 , RR-0747 , RR-0760 , RR-0774 , RR-0771 , RR-0784 , RR-0807 , RR-0848 , RR-0857 , RR-0847 , RR-0843 , RR-1379 , RR-1321 , RR-0279 , RR-1192 , RR-1235 , RR-1207 , RR-1342 , RR-1357 , RR-0749 , RR-1287 , RR-1274 , RR-1302 , RR-1391 , RR-1382 , RR-1296 , RR-1265 , RR-1228 , RR-1292 , RR-1234 , RR-1268 , RR-1167 , RR-1255 , RR-1416 , RR-1532 , RR-1497 , RR-1524 , RR-1512 , RR-1430 , RR-1463 , RR-1450 , RR-1439 , RR-1610 , RR-1580 , RR-0935 , RR-0940 , RR-0966 , RR-1039 , RR-1045 , RR-1033 , RR-1070 , RR-1140 , RR-1106 , RR-1138 , RR-0863 , RR-1246 , RR-1624 , RR-1572 , RR-1618 , RR-1731 , RR-1834 , RR-0133 , RR-1853 , RR-1802 , RR-1884 , RR-1908 , RR-1784 , RR-1885 , RR-1868 , RR-1779 , RR-1837 , RR-1818 , RR-1795 , RR-1662 , RR-1780 , RR-1697 , RR-1678 , RR-1913 , RR-1636 , RR-2121 , RR-1782 , RR-1869 , RR-1644 , RR-1902 , RR-1750 , RR-1719 , RR-1735 , RR-2362 , RR-2156 , RR-2257 , RR-2291 , RR-1968 , RR-2085 , RR-2315 , RR-2359 , RR-2132 , RR-2214 , RR-2027 , RR-1620 , RR-2171 , RR-2089 , RR-2064 , RR-2190 , RR-1962 , RR-2317 , RR-1957 , RR-2152 , RR-1974 , RR-2255 , RR-2207 , RR-1935 , RR-1961 , RR-2005 , RR-2296 , RR-2245 , RR-2071 , RR-2287 , RR-2127 , RR-2251 , RR-2174 , RR-2202 , RR-2175 , RR-2351 , RR-2136 , RR-1280 , RR2372AS
Loss of the view from the road and need to pay to see Stonehenge in the future which is in breach of the conditions of Cecil Chubb's gift to the nation.	RR-0022 , RR-0070 , RR-0059 , RR-0110 , RR-0278 , RR-0309 , RR-0248 , RR-0290 , RR-0135 , RR-0185 , RR-0255 , RR-0233 , RR-0172 , RR-0220 , RR-0331 , RR-0344 , RR-0038 , RR-0326 , RR-0130 , RR-0219 , RR-0150 , RR-0057 , RR-0071 , RR-0174 , RR-0191 , RR-0212 , RR-0114 , RR-0330 , RR-0319 , RR-0292 , RR-0063 , RR-0200 , RR-0237 , RR-0113 , RR-0206 , RR-0083 , RR-0165 , RR-0187 , RR-0293 , RR-0120 , RR-0094 , RR-0298 , RR-0123 , RR-0169 , RR-0340 , RR-0318 , RR-0159 , RR-0089 , RR-0241 , RR-0275 , RR-0341 , RR-0128 , RR-0068 , RR-0118 , RR-0156 , RR-0256 , RR-0175 , RR-0221 , RR-0263 , RR-0155 , RR-0081 , RR-0040 , RR-0192 , RR-0273 , RR-0126 , RR-0170 , RR-0310 , RR-0164 , RR-0213 , RR-0137 , RR-0454 , RR-0567 , RR-0485 , RR-0468 , RR-0488 , RR-0391 , RR-0522 , RR-0531 , RR-0470 , RR-0539 , RR-0502 , RR-0602 , RR-0624 , RR-0596 , RR-0443 , RR-0525 , RR-0593 , RR-0465 , RR-0441 , RR-0484 , RR-0508 , RR-0489 , RR-0560 , RR-0586 , RR-0408 , RR-0504 , RR-0540 , RR-0387 , RR-

Summary of Comment Received	Relevant Representation Reference Number
	0359 , RR-0429 , RR-0500 , RR-0510 , RR-0564 , RR-0451 , RR-0523 , RR-0369 , RR-0512 , RR-0435 , RR-0557 , RR-0438 , RR-0358 , RR-0381 , RR-0455 , RR-0436 , RR-0608 , RR-0505 , RR-0553 , RR-0427 , RR-0492 , RR-0366 , RR-0469 , RR-0422 , RR-0655 , RR-0627 , RR-0717 , RR-0635 , RR-0651 , RR-0716 , RR-0644 , RR-0674 , RR-0634 , RR-0709 , RR-0690 , RR-0714 , RR-0629 , RR-0637 , RR-0638 , RR-0664 , RR-0676 , RR-0710 , RR-0657 , RR-0697 , RR-0761 , RR-0743 , RR-0736 , RR-0763 , RR-0742 , RR-0750 , RR-0728 , RR-0751 , RR-0756 , RR-0769 , RR-0788 , RR-0780 , RR-0797 , RR-0793 , RR-0801 , RR-0802 , RR-0830 , RR-0813 , RR-0833 , RR-0832 , RR-0827 , RR-0848 , RR-0849 , RR-1311 , RR-1387 , RR-1319 , RR-1170 , RR-1347 , RR-1218 , RR-1297 , RR-1278 , RR-1362 , RR-1222 , RR-1270 , RR-1301 , RR-1216 , RR-1192 , RR-1152 , RR-1354 , RR-1290 , RR-1401 , RR-1155 , RR-1327 , RR-1357 , RR-1213 , RR-1358 , RR-1307 , RR-1371 , RR-1395 , RR-1338 , RR-1335 , RR-1304 , RR-1350 , RR-1212 , RR-1165 , RR-1313 , RR-1181 , RR-0516 , RR-1330 , RR-1375 , RR-1231 , RR-1334 , RR-1277 , RR-1308 , RR-1522 , RR-0633 , RR-1433 , RR-1469 , RR-1491 , RR-1478 , RR-1532 , RR-1460 , RR-1459 , RR-1422 , RR-1405 , RR-1415 , RR-1417 , RR-1472 , RR-1453 , RR-1465 , RR-1500 , RR-1411 , RR-1420 , RR-1457 , RR-1484 , RR-1483 , RR-1425 , RR-1475 , RR-1443 , RR-1467 , RR-1461 , RR-1514 , RR-1430 , RR-1463 , RR-1418 , RR-1458 , RR-1440 , RR-1528 , RR-1504 , RR-1511 , RR-1523 , RR-1530 , RR-1480 , RR-1423 , RR-1445 , RR-1610 , RR-1587 , RR-1185 , RR-0903 , RR-0918 , RR-0920 , RR-0940 , RR-0941 , RR-0944 , RR-0943 , RR-0957 , RR-0956 , RR-0959 , RR-0969 , RR-0960 , RR-0962 , RR-0981 , RR-0975 , RR-0986 , RR-0978 , RR-0972 , RR-0997 , RR-0991 , RR-0982 , RR-1015 , RR-1000 , RR-1022 , RR-1020 , RR-1059 , RR-1057 , RR-1066 , RR-1142 , RR-1126 , RR-1086 , RR-1075 , RR-1111 , RR-1084 , RR-1100 , RR-1112 , RR-1122 , RR-1083 , RR-1072 , RR-1074 , RR-1120 , RR-1135 , RR-1113 , RR-1116 , RR-1082 , RR-1130 , RR-1096 , RR-1127 , RR-1109 , RR-1064 , RR-1118 , RR-1091 , RR-1102 , RR-1069 , RR-1095 , RR-1345 , RR-1346 , RR-1388 , RR-1289 , RR-0869 , RR-0870 , RR-0871 , RR-0883 , RR-0880 , RR-1221 , RR-1162 , RR-1236 , RR-1153 , RR-1248 , RR-0889 , RR-1567 , RR-1619 , RR-1597 , RR-1564 , RR-1578 , RR-1560 , RR-1568 , RR-1603 , RR-1624 , RR-1625 , RR-1575 , RR-1535 , RR-1553 , RR-1809 , RR-1731 , RR-1891 , RR-1660 , RR-1712 , RR-1677 , RR-1716 , RR-1710 , RR-1798 , RR-1898 , RR-1699 , RR-1652 , RR-1821 , RR-1727 , RR-1853 , RR-1882 , RR-1633 , RR-1859 , RR-1867 , RR-1804 , RR-1872 , RR-1806 , RR-1638 , RR-1858 , RR-1866 , RR-1884 , RR-1746 , RR-0928 , RR-1679 , RR-1851 , RR-1673 , RR-1682 , RR-1733 , RR-1654 , RR-1784 , RR-1829 , RR-1752 , RR-1874 , RR-1768 , RR-1892 , RR-1815 , RR-1651 , RR-1841 , RR-1856 , RR-1779 , RR-1669 , RR-1837 , RR-1698 , RR-1917 , RR-1895 , RR-1724 , RR-1824 , RR-1664 , RR-1762 , RR-1776 , RR-1863 , RR-1705 , RR-1697 , RR-1700 , RR-1678 , RR-1788 , RR-1692 , RR-1913 , RR-1875 , RR-1835 , RR-1636 , RR-2121 , RR-2273 , RR-2285 , RR-2269 , RR-2100 , RR-1629 , RR-1773 , RR-1803 , RR-1734 , RR-1782 , RR-1637 , RR-1915 , RR-1650 , RR-1695 , RR-1657 , RR-1869 , RR-1870 , RR-1643 , RR-1644 , RR-1789 , RR-1630 , RR-1838 , RR-1902 , RR-1889 , RR-1680 , RR-0426 , RR-1748 , RR-1717 , RR-1718 , RR-1719 , RR-1661 , RR-1893 , RR-1769 , RR-1946 , RR-1971 , RR-2311 , RR-2250 , RR-2046 , RR-2135 , RR-2166 , RR-2165 , RR-2158 , RR-2054 , RR-2011 , RR-2185 , RR-2184 , RR-2350 , RR-2087 , RR-1927 , RR-2228 , RR-2214 , RR-2097 , RR-2164 , RR-2033 , RR-2173 , RR-2120 , RR-2019 , RR-1783 , RR-1833 , RR-1672 , RR-1738 , RR-1888 , RR-1653 , RR-1763 , RR-2092 , RR-1930 , RR-2336 , RR-2172 , RR-2171 , RR-2032 , RR-2145 , RR-2024 , RR-2167 , RR-2367 , RR-2128 , RR-2368 , RR-2205 , RR-1981 , RR-2138 , RR-2059 , RR-2256 , RR-2241 , RR-2295 , RR-1993 , RR-

Summary of Comment Received	Relevant Representation Reference Number
	2188 , RR-2030 , RR-2319 , RR-1976 , RR-2043 , RR-1963 , RR-2068 , RR-2192 , RR-2230 , RR-2330 , RR-2095 , RR-2221 , RR-2358 , RR-2053 , RR-1933 , RR-2105 , RR-2346 , RR-2299 , RR-1938 , RR-2070 , RR-2300 , RR-2104 , RR-2267 , RR-2279 , RR-2106 , RR-1959 , RR-2029 , RR-2007 , RR-2103 , RR-2162 , RR-2045 , RR-2276 , RR-2056 , RR-2118 , RR-1994 , RR-2155 , RR-2086 , RR-2195 , RR-2212 , RR-1926 , RR-2239 , RR-2242 , RR-1947 , RR-2370 , RR-1997 , RR-2117 , RR-2096 , RR-1975

Appendix D - Draft Development Consent Order, Consultation and Process

Summary of Comment Received	Relevant Representation Reference Number
Lack of alternative options in consultation that would not damage the World Heritage Site.	RR-0001 , RR-0019 , RR-0034 , RR-0070 , RR-0161 , RR-0300 , RR-0059 , RR-0294 , RR-0102 , RR-0235 , RR-0309 , RR-0248 , RR-0290 , RR-0179 , RR-0135 , RR-0185 , RR-0203 , RR-0209 , RR-0255 , RR-0233 , RR-0220 , RR-0331 , RR-0344 , RR-0038 , RR-0326 , RR-0097 , RR-0050 , RR-0150 , RR-0176 , RR-0046 , RR-0217 , RR-0242 , RR-0171 , RR-0191 , RR-0339 , RR-0259 , RR-0212 , RR-0124 , RR-0319 , RR-0063 , RR-0200 , RR-0237 , RR-0055 , RR-0113 , RR-0208 , RR-0109 , RR-0145 , RR-0261 , RR-0100 , RR-0206 , RR-0083 , RR-0214 , RR-0061 , RR-0293 , RR-0094 , RR-0183 , RR-0345 , RR-0298 , RR-0123 , RR-0169 , RR-0251 , RR-0318 , RR-0060 , RR-0159 , RR-0089 , RR-0241 , RR-0086 , RR-0275 , RR-0286 , RR-0341 , RR-0128 , RR-0053 , RR-0118 , RR-0156 , RR-0256 , RR-0236 , RR-0096 , RR-0338 , RR-0101 , RR-0221 , RR-0121 , RR-0155 , RR-0238 , RR-0062 , RR-0196 , RR-0131 , RR-0069 , RR-0245 , RR-0108 , RR-0192 , RR-0273 , RR-0047 , RR-0164 , RR-0213 , RR-0327 , RR-0137 , RR-0098 , RR-0284 , RR-0144 , RR-0547 , RR-0404 , RR-0468 , RR-0530 , RR-0620 , RR-0395 , RR-0452 , RR-0371 , RR-0456 , RR-0541 , RR-0531 , RR-0401 , RR-0446 , RR-0470 , RR-0539 , RR-0482 , RR-0602 , RR-0624 , RR-0443 , RR-0607 , RR-0364 , RR-0465 , RR-0458 , RR-0441 , RR-0445 , RR-0489 , RR-0434 , RR-0612 , RR-0408 , RR-0504 , RR-0387 , RR-0503 , RR-0359 , RR-0370 , RR-0500 , RR-0533 , RR-0526 , RR-0564 , RR-0357 , RR-0451 , RR-0523 , RR-0480 , RR-0421 , RR-0467 , RR-0369 , RR-0569 , RR-0435 , RR-0598 , RR-0544 , RR-0583 , RR-0438 , RR-0382 , RR-0381 , RR-0396 , RR-0368 , RR-0455 , RR-0436 , RR-0450 , RR-0520 , RR-0563 , RR-0608 , RR-0505 , RR-0553 , RR-0492 , RR-0469 , RR-0440 , RR-0627 , RR-0648 , RR-0717 , RR-0696 , RR-0651 , RR-0631 , RR-0649 , RR-0718 , RR-0716 , RR-0644 , RR-0692 , RR-0658 , RR-0674 , RR-0661 , RR-0634 , RR-0629 , RR-0702 , RR-0694 , RR-0663 , RR-0664 , RR-0705 , RR-0676 , RR-0672 , RR-0639 , RR-0693 , RR-0657 , RR-0697 , RR-0761 , RR-0732 , RR-0731 , RR-0753 , RR-0742 , RR-0752 , RR-0738 , RR-0728 , RR-0751 , RR-0756 , RR-0781 , RR-0769 , RR-0772 , RR-0788 , RR-0773 , RR-0779 , RR-0767 , RR-0765 , RR-0780 , RR-0777 , RR-0795 , RR-0793 , RR-0801 , RR-0798 , RR-0802 , RR-0830 , RR-0813 , RR-0833 , RR-0816 , RR-0823 , RR-0832 , RR-0822 , RR-0818 , RR-0824 , RR-0853 , RR-0857 , RR-0849 , RR-1311 , RR-1276 , RR-1170 , RR-1347 , RR-1326 , RR-1148 , RR-1257 , RR-1337 , RR-1278 , RR-1362 , RR-1222 , RR-1270 , RR-1204 , RR-1301 , RR-1203 , RR-1161 , RR-1216 , RR-1147 , RR-1240 , RR-1354 , RR-1290 , RR-1401 , RR-1343 , RR-1283 , RR-1155 , RR-1168 , RR-1327 , RR-1357 , RR-1145 , RR-1198 , RR-1325 , RR-1315 , RR-1211 , RR-1291 , RR-1386 , RR-1193 , RR-1199 , RR-1302 , RR-1213 , RR-1187 , RR-1217 , RR-1262 , RR-1238 , RR-1371 , RR-1395 , RR-1230 , RR-1250 , RR-1304 , RR-1350 , RR-1212 , RR-1175 , RR-1172 , RR-1224 , RR-1165 , RR-1313 , RR-1181 , RR-1267 , RR-1286 , RR-1380 , RR-1375 , RR-1323 , RR-1348 , RR-1277 , RR-1308 , RR-1522 , RR-1486 , RR-1416 , RR-1479 , RR-1499 , RR-1469 , RR-1410 , RR-1460 , RR-1501 , RR-1519 , RR-1405 , RR-1495 , RR-1417 , RR-1453 , RR-1498 , RR-1500 , RR-1455 , RR-1411 , RR-1471 , RR-1457 , RR-1484 , RR-1447 , RR-1427 , RR-1425 , RR-1477 , RR-1467 , RR-1527 , RR-1496 , RR-1418 , RR-1419 , RR-1531 , RR-1440 , RR-1528 , RR-1480 , RR-1533 , RR-0906 , RR-0918 , RR-0916 , RR-0919 , RR-0931 , RR-0927 , RR-0929 , RR-0936 , RR-

Summary of Comment Received	Relevant Representation Reference Number
	0941 , RR-0949 , RR-0944 , RR-0943 , RR-0958 , RR-0955 , RR-0970 , RR-0969 , RR-0964 , RR-0962 , RR-0995 , RR-0981 , RR-0974 , RR-0986 , RR-0997 , RR-0991 , RR-0987 , RR-1000 , RR-1022 , RR-1035 , RR-1059 , RR-1051 , RR-1126 , RR-1067 , RR-1081 , RR-1084 , RR-1112 , RR-1073 , RR-1122 , RR-1104 , RR-1135 , RR-1113 , RR-1116 , RR-1130 , RR-1096 , RR-1064 , RR-1118 , RR-1103 , RR-1091 , RR-1102 , RR-1094 , RR-1115 , RR-1128 , RR-1095 , RR-1108 , RR-1346 , RR-1388 , RR-1289 , RR-0855 , RR-0863 , RR-0868 , RR-0871 , RR-0882 , RR-0880 , RR-0027 , RR-1221 , RR-1246 , RR-1153 , RR-0889 , RR-1614 , RR-1562 , RR-1567 , RR-1619 , RR-0532 , RR-1560 , RR-1568 , RR-1624 , RR-1575 , RR-1556 , RR-1596 , RR-1666 , RR-1660 , RR-1712 , RR-1677 , RR-1715 , RR-1710 , RR-1743 , RR-1683 , RR-1821 , RR-1727 , RR-1882 , RR-1633 , RR-1832 , RR-1859 , RR-1867 , RR-1804 , RR-1872 , RR-1806 , RR-1638 , RR-1767 , RR-1858 , RR-1823 , RR-1755 , RR-1866 , RR-1746 , RR-1918 , RR-1679 , RR-1851 , RR-1673 , RR-1682 , RR-1733 , RR-1784 , RR-1752 , RR-1805 , RR-1768 , RR-1781 , RR-1732 , RR-1651 , RR-1841 , RR-1865 , RR-1779 , RR-1800 , RR-0887 , RR-1698 , RR-1917 , RR-1895 , RR-1724 , RR-1639 , RR-1824 , RR-1762 , RR-1820 , RR-1863 , RR-1705 , RR-1697 , RR-1807 , RR-1785 , RR-1700 , RR-1678 , RR-1720 , RR-1788 , RR-1835 , RR-1830 , RR-1855 , RR-2273 , RR-1965 , RR-2285 , RR-2015 , RR-2081 , RR-1629 , RR-1734 , RR-1685 , RR-1637 , RR-1696 , RR-1915 , RR-1650 , RR-1668 , RR-1695 , RR-1810 , RR-1657 , RR-1869 , RR-1870 , RR-1684 , RR-1643 , RR-1842 , RR-1644 , RR-1906 , RR-1789 , RR-1711 , RR-1739 , RR-1737 , RR-1877 , RR-1630 , RR-1838 , RR-1674 , RR-1902 , RR-0278 , RR-1748 , RR-1717 , RR-1718 , RR-1719 , RR-1661 , RR-1893 , RR-1769 , RR-1764 , RR-1946 , RR-1971 , RR-2250 , RR-2302 , RR-2257 , RR-2196 , RR-2217 , RR-2166 , RR-2165 , RR-2158 , RR-2085 , RR-2315 , RR-2262 , RR-2054 , RR-1969 , RR-2011 , RR-2185 , RR-2184 , RR-1846 , RR-2084 , RR-2073 , RR-1927 , RR-2228 , RR-2193 , RR-2125 , RR-2097 , RR-2093 , RR-2033 , RR-2173 , RR-2120 , RR-2019 , RR-1690 , RR-1783 , RR-1672 , RR-1738 , RR-1888 , RR-1659 , RR-1751 , RR-1653 , RR-2336 , RR-2145 , RR-2167 , RR-2064 , RR-2367 , RR-2305 , RR-2205 , RR-1981 , RR-2138 , RR-2256 , RR-1949 , RR-2241 , RR-2067 , RR-2303 , RR-2177 , RR-2044 , RR-2326 , RR-2112 , RR-2330 , RR-2082 , RR-2358 , RR-2042 , RR-2105 , RR-2310 , RR-2119 , RR-2026 , RR-2187 , RR-2238 , RR-2065 , RR-2318 , RR-2346 , RR-2070 , RR-2306 , RR-2232 , RR-2104 , RR-2364 , RR-2134 , RR-2062 , RR-2267 , RR-2279 , RR-2106 , RR-2216 , RR-2103 , RR-2045 , RR-2143 , RR-2056 , RR-1994 , RR-2155 , RR-2342 , RR-2328 , RR-2239 , RR-2242 , RR-2023 , RR-2150 , RR-2370 , RR-2020 , RR-1989 , RR-1997 , RR-2286 , RR-2090 , RR-2201 , RR-2088 , RR-2220 , RR-2123

Appendix E - Noise and Vibration and Air Quality, Dust and Other Emissions

Summary of Comment Received	Relevant Representation Reference Number
Increased noise and air pollution from faster traffic	RR-0025 , RR-0014 , RR-0070 , RR-0059 , RR-0294 , RR-0110 , RR-0184 , RR-0290 , RR-0179 , RR-0135 , RR-0185 , RR-0255 , RR-0233 , RR-0331 , RR-0344 , RR-0205 , RR-0326 , RR-0130 , RR-0104 , RR-0150 , RR-0046 , RR-0246 , RR-0295 , RR-0191 , RR-0339 , RR-0212 , RR-0319 , RR-0063 , RR-0237 , RR-0261 , RR-0206 , RR-0083 , RR-0120 , RR-0094 , RR-0298 , RR-0169 , RR-0318 , RR-0159 , RR-0089 , RR-0286 , RR-0341 , RR-0128 , RR-0068 , RR-0118 , RR-0156 , RR-0256 , RR-0175 , RR-0101 , RR-0221 , RR-0155 , RR-0062 , RR-0192 , RR-0273 , RR-0182 , RR-0164 , RR-0137 , RR-0284 , RR-0229 , RR-0148 , RR-0454 , RR-0404 , RR-0468 , RR-0488 , RR-0550 , RR-0620 , RR-0391 , RR-0452 , RR-0456 , RR-0531 , RR-0401 , RR-0470 , RR-0539 , RR-0482 , RR-0519 , RR-0494 , RR-0602 , RR-0624 , RR-0551 , RR-0443 , RR-0465 , RR-0458 , RR-0408 , RR-0601 , RR-0359 , RR-0370 , RR-0510 , RR-0564 , RR-0357 , RR-0451 , RR-0523 , RR-0369 , RR-0512 , RR-0438 , RR-0381 , RR-0608 , RR-0505 , RR-0469 , RR-0655 , RR-0627 , RR-0717 , RR-0680 , RR-0641 , RR-0634 , RR-0650 , RR-0629 , RR-0702 , RR-0638 , RR-0664 , RR-0676 , RR-0668 , RR-0657 , RR-0697 , RR-0761 , RR-0743 , RR-0753 , RR-0742 , RR-0752 , RR-0750 , RR-0728 , RR-0756 , RR-0766 , RR-0769 , RR-0776 , RR-0788 , RR-0773 , RR-0767 , RR-0784 , RR-0793 , RR-0805 , RR-0801 , RR-0798 , RR-0813 , RR-0833 , RR-0832 , RR-0849 , RR-0843 , RR-1311 , RR-1170 , RR-1347 , RR-1362 , RR-1222 , RR-1252 , RR-1270 , RR-1161 , RR-1216 , RR-1152 , RR-1293 , RR-1290 , RR-1401 , RR-1378 , RR-1155 , RR-1327 , RR-1342 , RR-1357 , RR-1145 , RR-1198 , RR-1256 , RR-1229 , RR-1213 , RR-1146 , RR-1307 , RR-1316 , RR-1371 , RR-1373 , RR-1254 , RR-1250 , RR-1304 , RR-1212 , RR-1292 , RR-1165 , RR-1313 , RR-0516 , RR-1375 , RR-1277 , RR-1308 , RR-0633 , RR-1431 , RR-1491 , RR-1487 , RR-1453 , RR-1500 , RR-1408 , RR-1483 , RR-1516 , RR-1425 , RR-1467 , RR-1496 , RR-1440 , RR-1511 , RR-1480 , RR-0921 , RR-0920 , RR-0929 , RR-0941 , RR-0944 , RR-0943 , RR-0948 , RR-0970 , RR-0962 , RR-0997 , RR-0991 , RR-1006 , RR-1022 , RR-1057 , RR-1050 , RR-1065 , RR-1126 , RR-1104 , RR-1074 , RR-1135 , RR-1113 , RR-1140 , RR-1116 , RR-1130 , RR-1096 , RR-1141 , RR-1064 , RR-1118 , RR-1102 , RR-1128 , RR-1346 , RR-1388 , RR-0870 , RR-0871 , RR-0883 , RR-0880 , RR-1221 , RR-1246 , RR-1236 , RR-1248 , RR-0889 , RR-1619 , RR-1560 , RR-1568 , RR-1592 , RR-1575 , RR-1731 , RR-1660 , RR-1712 , RR-1710 , RR-1798 , RR-1898 , RR-1821 , RR-1882 , RR-1633 , RR-1757 , RR-1859 , RR-1880 , RR-1867 , RR-1804 , RR-1872 , RR-1638 , RR-1858 , RR-1866 , RR-1648 , RR-1746 , RR-1851 , RR-1673 , RR-1682 , RR-1733 , RR-1784 , RR-1752 , RR-1805 , RR-1874 , RR-1794 , RR-1671 , RR-1878 , RR-1768 , RR-1641 , RR-1779 , RR-1698 , RR-1895 , RR-1824 , RR-1664 , RR-1762 , RR-1778 , RR-1863 , RR-1894 , RR-1697 , RR-1816 , RR-1807 , RR-1700 , RR-1678 , RR-1916 , RR-1788 , RR-1913 , RR-1855 , RR-2121 , RR-2273 , RR-1965 , RR-2285 , RR-2269 , RR-1773 , RR-1685 , RR-1637 , RR-1915 , RR-1650 , RR-1695 , RR-1657 , RR-1869 , RR-1870 , RR-1831 , RR-1643 , RR-1644 , RR-1828 , RR-1630 , RR-1674 , RR-1902 , RR-1680 , RR-0426 , RR-1748 , RR-1719 , RR-1661 , RR-1769 , RR-2250 , RR-2146 , RR-2122 , RR-2166 , RR-2165 , RR-2158 , RR-2054 , RR-2011 , RR-2185 , RR-2184 , RR-2087 , RR-2214 , RR-2097 , RR-2164 , RR-2033 , RR-2120 , RR-2019 , RR-1783 , RR-1886 , RR-1672 , RR-1665 , RR-1888 , RR-1653 , RR-1991 , RR-2335 , RR-2321 , RR-2167 , RR-2367 , RR-2368 , RR-2205 , RR-1981 , RR-2199 , RR-2138 , RR-1949 , RR-2241 , RR-2152 , RR-2274 , RR-2039 , RR-1976 , RR-2189 , RR-2330 , RR-2221 , RR-2358 , RR-1987 , RR-2105 , RR-2283 ,

Summary of Comment Received	Relevant Representation Reference Number
	RR-2265 , RR-2346 , RR-2070 , RR-2300 , RR-2104 , RR-2364 , RR-2062 , RR-2279 , RR-2181 , RR-2106 , RR-2103 , RR-2162 , RR-2045 , RR-1994 , RR-2155 , RR-2239 , RR-2242 , RR-1997 , RR-2107 , RR-1280, RR-2233

Appendix F - Biodiversity, Biological Environment and Ecology

Summary of Comment Received	Relevant Representation Reference Number
Adverse impacts on ecology, including protected species.	RR-0059 , RR-0102 , RR-0106 , RR-0309 , RR-0179 , RR-0224 , RR-0304 , RR-0130 , RR-0116 , RR-0171 , RR-0191 , RR-0124 , RR-0200 , RR-0120 , RR-0287 , RR-0041 , RR-0263 , RR-0178 , RR-0305 , RR-0131 , RR-0182 , RR-0204 , RR-0148 , RR-0490 , RR-0555 , RR-0391 , RR-0371 , RR-0456 , RR-0554 , RR-0494 , RR-0409 , RR-0596 , RR-0593 , RR-0361 , RR-0441 , RR-0449 , RR-0434 , RR-0382 , RR-0455 , RR-0498 , RR-0402 , RR-0462 , RR-0356 , RR-0680 , RR-0641 , RR-0665 , RR-0638 , RR-0686 , RR-0743 , RR-0750 , RR-0780 , RR-1272 , RR-1218 , RR-1299 , RR-1303 , RR-1259 , RR-1210 , RR-1161 , RR-1370 , RR-1321 , RR-1201 , RR-1305 , RR-1235 , RR-1176 , RR-1207 , RR-1325 , RR-1229 , RR-1249 , RR-1154 , RR-1302 , RR-1195 , RR-1372 , RR-1217 , RR-1146 , RR-1316 , RR-1230 , RR-1265 , RR-1292 , RR-1267 , RR-1286 , RR-1392 , RR-1233 , RR-1416 , RR-1433 , RR-1407 , RR-1468 , RR-1453 , RR-1408 , RR-1421 , RR-1430 , RR-1463 , RR-1458 , RR-1610 , RR-0899 , RR-0940 , RR-0948 , RR-0959 , RR-0981 , RR-0971 , RR-0972 , RR-1006 , RR-1016 , RR-1000 , RR-1050 , RR-1066 , RR-1119 , RR-1124 , RR-1084 , RR-1082 , RR-1345 , RR-0870 , RR-0883 , RR-1248 , RR-1562 , RR-1567 , RR-1574 , RR-1624 , RR-1535 , RR-1553 , RR-1545 , RR-1710 , RR-1798 , RR-1714 , RR-1777 , RR-1805 , RR-1671 , RR-1892 , RR-1781 , RR-1645 , RR-1779 , RR-1837 , RR-1776 , RR-1705 , RR-1816 , RR-1692 , RR-1636 , RR-1887 , RR-1855 , RR-2121 , RR-1782 , RR-1730 , RR-1685 , RR-1668 , RR-1644 , RR-1674 , RR-1922 , RR-1719 , RR-2146 , RR-2165 , RR-2270 , RR-2087 , RR-1910 , RR-1659 , RR-1763 , RR-2009 , RR-2288 , RR-2199 , RR-2067 , RR-2130 , RR-1976 , RR-1961 , RR-1987 , RR-2316 , RR-2318 , RR-1943 , RR-2232 , RR-2174 , RR-2208 , RR-2181 , RR-2106 , RR-1954 , RR-2007 , RR-2162 , RR-2047 , RR-2150 , RR-2284 , RR-2286 , RR-2136 , RR-2088
Disturbance of rare bird species (stone curlew and great bustard).	RR-0070 , RR-0059 , RR-0294 , RR-0110 , RR-0278 , RR-0179 , RR-0135 , RR-0185 , RR-0304 , RR-0255 , RR-0233 , RR-0331 , RR-0344 , RR-0205 , RR-0326 , RR-0130 , RR-0104 , RR-0150 , RR-0217 , RR-0242 , RR-0091 , RR-0330 , RR-0124 , RR-0319 , RR-0063 , RR-0200 , RR-0237 , RR-0208 , RR-0145 , RR-0261 , RR-0285 , RR-0206 , RR-0083 , RR-0296 , RR-0120 , RR-0094 , RR-0183 , RR-0298 , RR-0169 , RR-0318 , RR-0159 , RR-0089 , RR-0286 , RR-0341 , RR-0128 , RR-0068 , RR-0118 , RR-0156 , RR-0256 , RR-0236 , RR-0240 , RR-0325 , RR-0221 , RR-0041 , RR-0178 , RR-0155 , RR-0073 , RR-0069 , RR-0262 , RR-0192 , RR-0273 , RR-0126 , RR-0164 , RR-0137 , RR-0284 , RR-0229 , RR-0454 , RR-0547 , RR-0567 , RR-0468 , RR-0452 , RR-0371 , RR-0531 , RR-0401 , RR-0470 , RR-0539 , RR-0519 , RR-0602 , RR-0624 , RR-0443 , RR-0465 , RR-0458 , RR-0445 , RR-0489 , RR-0560 , RR-0408 , RR-0540 , RR-0601 , RR-0359 , RR-0370 , RR-0510 , RR-0357 , RR-0451 , RR-0523 , RR-0467 , RR-0369 , RR-0438 , RR-0381 , RR-0455 , RR-0436 , RR-0415 , RR-0608 , RR-0505 , RR-0495 , RR-0655 , RR-0648 , RR-0716 , RR-0692 , RR-0634 , RR-0650 , RR-0629 , RR-0703 , RR-0702 , RR-0664 , RR-0705 , RR-0668 , RR-0657 , RR-0697 , RR-0761 , RR-0727 , RR-0743 , RR-0731 , RR-0742 , RR-0752 , RR-0738 , RR-0728 , RR-0751 , RR-0756 , RR-0769 , RR-0776 , RR-0772 , RR-0788 , RR-0773 , RR-0770 , RR-0795 , RR-0793 , RR-0801 , RR-0813 , RR-0833 , RR-0832 , RR-0822 , RR-0854 , RR-0849 , RR-1311 , RR-1214 , RR-1276 , RR-1170 , RR-1347 , RR-1218 , RR-1169 , RR-1362 , RR-1222 , RR-1182 , RR-1270 , RR-1301 , RR-1216 , RR-1166 , RR-1192 , RR-1152 , RR-1293 , RR-1201 , RR-1354 , RR-1353 , RR-1328 , RR-1401 , RR-1378 , RR-1155 , RR-1327 , RR-1357 , RR-1145 , RR-1367 , RR-1144 , RR-1198 , RR-1256 , RR-1315 , RR-1376 , RR-1281 , RR-1188 , RR-1190 , RR-1291 ,

Summary of Comment Received	Relevant Representation Reference Number
	RR-1386 , RR-1193 , RR-1213 , RR-1146 , RR-1307 , RR-1316 , RR-1262 , RR-1371 , RR-1373 , RR-1395 , RR-1250 , RR-1304 , RR-1212 , RR-1172 , RR-1165 , RR-1313 , RR-0516 , RR-1286 , RR-1151 , RR-1375 , RR-1308 , RR-1522 , RR-1416 , RR-0633 , RR-1499 , RR-1407 , RR-1520 , RR-1491 , RR-1478 , RR-1460 , RR-1426 , RR-1417 , RR-1403 , RR-1472 , RR-1489 , RR-1432 , RR-1453 , RR-1500 , RR-1455 , RR-1457 , RR-1466 , RR-1447 , RR-1529 , RR-1444 , RR-1425 , RR-1467 , RR-1527 , RR-1461 , RR-1496 , RR-1440 , RR-1528 , RR-1511 , RR-1480 , RR-1445 , RR-1610 , RR-1557 , RR-0906 , RR-0918 , RR-0929 , RR-0941 , RR-0949 , RR-0944 , RR-0943 , RR-0955 , RR-0970 , RR-0969 , RR-0964 , RR-0962 , RR-0986 , RR-0972 , RR-0997 , RR-0991 , RR-1000 , RR-1022 , RR-1020 , RR-1035 , RR-1051 , RR-1055 , RR-1061 , RR-1136 , RR-1066 , RR-1126 , RR-1093 , RR-1084 , RR-1100 , RR-1139 , RR-1125 , RR-1104 , RR-1074 , RR-1135 , RR-1113 , RR-1116 , RR-1130 , RR-1096 , RR-1109 , RR-1064 , RR-1118 , RR-1091 , RR-1102 , RR-1346 , RR-1388 , RR-0855 , RR-0870 , RR-0871 , RR-0874 , RR-0882 , RR-0883 , RR-0880 , RR-1221 , RR-1236 , RR-1153 , RR-1248 , RR-0889 , RR-1614 , RR-1621 , RR-1619 , RR-1613 , RR-1585 , RR-1616 , RR-1578 , RR-1560 , RR-1568 , RR-1603 , RR-1592 , RR-1575 , RR-1618 , RR-1731 , RR-1834 , RR-1660 , RR-1919 , RR-1712 , RR-1677 , RR-1710 , RR-1798 , RR-1898 , RR-1683 , RR-1821 , RR-1727 , RR-1853 , RR-1882 , RR-1633 , RR-1703 , RR-1859 , RR-1867 , RR-1804 , RR-1872 , RR-1638 , RR-1858 , RR-1755 , RR-1866 , RR-1746 , RR-1839 , RR-1851 , RR-1673 , RR-1682 , RR-1733 , RR-1784 , RR-1752 , RR-1768 , RR-1781 , RR-1732 , RR-1744 , RR-1740 , RR-1837 , RR-1698 , RR-1917 , RR-1724 , RR-1824 , RR-1664 , RR-1762 , RR-1820 , RR-1921 , RR-1778 , RR-1705 , RR-1894 , RR-1697 , RR-1700 , RR-1678 , RR-1788 , RR-1913 , RR-2121 , RR-1973 , RR-2273 , RR-1965 , RR-2285 , RR-2100 , RR-2297 , RR-1629 , RR-1782 , RR-1685 , RR-1637 , RR-1915 , RR-1650 , RR-1695 , RR-1657 , RR-1869 , RR-1870 , RR-1684 , RR-1643 , RR-1644 , RR-1906 , RR-1640 , RR-1828 , RR-1630 , RR-1838 , RR-1902 , RR-1680 , RR-0426 , RR-1748 , RR-1717 , RR-1718 , RR-1719 , RR-1769 , RR-1764 , RR-1971 , RR-2311 , RR-2250 , RR-2302 , RR-2122 , RR-2291 , RR-2166 , RR-2054 , RR-2011 , RR-2185 , RR-2184 , RR-1927 , RR-2228 , RR-2214 , RR-2097 , RR-2033 , RR-2120 , RR-2019 , RR-1690 , RR-1783 , RR-1910 , RR-1833 , RR-1672 , RR-1738 , RR-1665 , RR-1888 , RR-1659 , RR-1751 , RR-1653 , RR-2335 , RR-2336 , RR-2172 , RR-2167 , RR-2367 , RR-2368 , RR-2205 , RR-2288 , RR-1981 , RR-2138 , RR-2256 , RR-1949 , RR-2241 , RR-1974 , RR-2030 , RR-2303 , RR-2039 , RR-1976 , RR-1963 , RR-2355 , RR-2326 , RR-2330 , RR-1961 , RR-2358 , RR-1933 , RR-2026 , RR-2346 , RR-2070 , RR-2300 , RR-2151 , RR-2306 , RR-2104 , RR-2364 , RR-2134 , RR-2267 , RR-2279 , RR-2292 , RR-2216 , RR-2029 , RR-2103 , RR-2162 , RR-2045 , RR-1994 , RR-2155 , RR-2195 , RR-2239 , RR-2242 , RR-2370 , RR-1972 , RR-1989 , RR-2107 , RR-1975 , RR-2201 , RR-2088 , RR-2220

Appendix G - Environmental Impact Assessment

Summary of Comment Received	Relevant Representation Reference Number
Very harmful to the environment.	RR-0011 , RR-0134 , RR-0106 , RR-0116, RR-0124 , RR-0177 , RR-0323 , RR-0056 , RR-0068 , RR-0305 , RR-0453 , RR-0569 , RR-0462 , RR-0651 , RR-0766 , RR-0805 , RR-0854 , RR-1295 , RR-1390 , RR-1150 , RR-1169 , RR-1239 , RR-1210 , RR-1226 , RR-1284 , RR-1305 , RR-1249 , RR-1230 , RR-1224 , RR-1368 , RR-1392 , RR-1408 , RR-0899 , RR-0981 , RR-0983 , RR-0993 , RR-1121 , RR-1090 , RR-0891 , RR-1221 , RR-1599 , RR-1565 , RR-1743 , RR-1699 , RR-1728 , RR-1727 , RR-1853 , RR-1703 , RR-1805 , RR-1878 , RR-1892 , RR-1865 , RR-1730 , RR-1765 , RR-1680 , RR-2291 , RR-2307 , RR-2087 , RR-2145 , RR-2071 , RR-2267 , RR-2147

Appendix H - Heritage and Historic Environment

Summary of Comment Received	Relevant Representation Reference Number
The Scheme would result in unacceptable impacts on our national heritage.	RR-0005 , RR-0004 , RR-0080 , RR-0042 , RR-0268 , RR-0079 , RR-0049 , RR-0195 , RR-0104 , RR-0087 , RR-0191 , RR-0165 , RR-0056 , RR-0266 , RR-0263 , RR-0305 , RR-0040 , RR-0277 , RR-0398 , RR-0488 , RR-0371 , RR-0483 , RR-0571 , RR-0419 , RR-0496 , RR-0520 , RR-0582 , RR-0638 , RR-0757 , RR-0744 , RR-0731 , RR-0764 , RR-0770 , RR-0797 , RR-0807 , RR-0796 , RR-0839 , RR-0824 , RR-1158 , RR-1227 , RR-1321 , RR-1290 , RR-1264 , RR-1327 , RR-1355 , RR-1154 , RR-1274 , RR-1344 , RR-1244 , RR-1265 , RR-1368 , RR-1392 , RR-1167 , RR-1507 , RR-1410 , RR-1413 , RR-1426 , RR-1501 , RR-1405 , RR-1492 , RR-1411 , RR-1457 , RR-1421 , RR-1414 , RR-1579 , RR-1607 , RR-0906 , RR-0934 , RR-0953 , RR-1004 , RR-1042 , RR-1034 , RR-1058 , RR-1110 , RR-1075 , RR-1132 , RR-1076 , RR-1106 , RR-1345 , RR-0863 , RR-0884 , RR-1236 , RR-1599 , RR-1561 , RR-1593 , RR-1677 , RR-1652 , RR-1694 , RR-1755 , RR-1654 , RR-1786 , RR-1667 , RR-1913 , RR-1983 , RR-1775 , RR-1635 , RR-1842 , RR-1825 , RR-1811 , RR-2291 , RR-2217 , RR-2262 , RR-2359 , RR-1969 , RR-2350 , RR-2087 , RR-1927 , RR-2144 , RR-2172 , RR-2191 , RR-2171 , RR-2226 , RR-1995 , RR-1974 , RR-2030 , RR-2198 , RR-1935 , RR-1986 , RR-2290 , RR-2265 , RR-2116 , RR-2111 , RR-1936 , RR-2007 , RR-1932
It is dangerous to plan on the basis that what we know now of the ancient landscape is all that exists in the ancient landscape.	RR-0025 , RR-0004 , RR-0146 , RR-0076 , RR-0202 , RR-0176 , RR-0254 , RR-0071 , RR-0292 , RR-0064 , RR-0187 , RR-0318 , RR-0180 , RR-0329 , RR-0263 , RR-0283 , RR-0058 , RR-0277 , RR-0098 , RR-0566 , RR-0626 , RR-0466 , RR-0614 , RR-0460 , RR-0489 , RR-0581 , RR-0509 , RR-0561 , RR-0592 , RR-0534 , RR-0559 , RR-0475 , RR-0396 , RR-0356 , RR-0671 , RR-0667 , RR-0726 , RR-0744 , RR-0774 , RR-0770 , RR-0813 , RR-0848 , RR-1227 , RR-1169 , RR-1159 , RR-1321 , RR-1290 , RR-1377 , RR-1325 , RR-1253 , RR-1251 , RR-1352 , RR-1332 , RR-1318 , RR-1268 , RR-1486 , RR-1409 , RR-1488 , RR-1411 , RR-1484 , RR-1470 , RR-1514 , RR-1476 , RR-0921 , RR-0934 , RR-0931 , RR-0940 , RR-0993 , RR-1013 , RR-1000 , RR-1029 , RR-1055 , RR-1110 , RR-1067 , RR-1085 , RR-0868 , RR-0882 , RR-1569 , RR-1759 , RR-1633 , RR-1649 , RR-1801 , RR-1884 , RR-1918 , RR-1905 , RR-1651 , RR-1669 , RR-1772 , RR-1916 , RR-1830 , RR-1966 , RR-2258 , RR-1983 , RR-2168 , RR-1817 , RR-1890 , RR-1870 , RR-1771 , RR-1770 , RR-2359 , RR-2006 , RR-2164 , RR-2171 , RR-1957 , RR-2000 , RR-2255 , RR-2001 , RR-2061 , RR-2209 , RR-1956 , RR-2310 , RR-2102 , RR-2265 , RR-2327 , RR-2299 , RR-2148 , RR-2333 , RR-1936 , RR-2301 , RR-2263 , RR-2342 , RR-2348 , RR-1945 , RR-2008 , RR-1040
Irreparable damage to the WHS, its archaeology and setting, described by UNESCO as a 'landscape without parallel'. It must be protected for future generations.	RR-2334 , RR-0018 , RR-0017 , RR-0007 , RR-0016 , RR-0001 , RR-0009 , RR-0004 , RR-0012 , RR-0010 , RR-0027 , RR-0028 , RR-0026 , RR-0029 , RR-0034 , RR-0035 , RR-0147 , RR-0162 , RR-0070 , RR-0282 , RR-0161 , RR-0300 , RR-0048 , RR-0211 , RR-0059 , RR-0294 , RR-0110 , RR-0146 , RR-0080 , RR-0189 , RR-0102 , RR-0278 , RR-0210 , RR-0106 , RR-0264 , RR-0167 , RR-0235 , RR-0066 , RR-0276 , RR-0309 , RR-0248 , RR-0321 , RR-0184 , RR-0179 , RR-0085 , RR-0267 , RR-0239 , RR-0224 , RR-0168 , RR-0135 , RR-0185 , RR-0076 , RR-0274 , RR-0304 , RR-0203 , RR-0209 , RR-0255 , RR-0233 , RR-0049 , RR-0220 , RR-0331 , RR-0039 , RR-0344 , RR-0205 , RR-0313 , RR-0157 , RR-0038 , RR-0288 , RR-0326 , RR-0130 , RR-0104 , RR-0194 , RR-0097 , RR-0219 , RR-0202 , RR-0317 , RR-0067 , RR-0149 , RR-0127 , RR-0116 , RR-0291 , RR-0088 , RR-0150 , RR-0176 , RR-0254 , RR-0057 , RR-0046 , RR-0217 , RR-0095 , RR-0111 , RR-0246 , RR-0242 , RR-0091 , RR-0071 , RR-0343 , RR-0044 , RR-0171 , RR-0174 , RR-0122 , RR-0295 , RR-0191 , RR-0252 , RR-0320 , RR-0339 , RR-0289 , RR-0119 , RR-0259 , RR-0212 , RR-0114 , RR-0124 , RR-0319 , RR-0132 , RR-

Summary of Comment Received	Relevant Representation Reference Number
	0092 , RR-0292 , RR-0143 , RR-0063 , RR-0064 , RR-0200 , RR-0065 , RR-0188 , RR-0336 , RR-0312 , RR-0237 , RR-0043 , RR-0055 , RR-0244 , RR-0078 , RR-0316 , RR-0342 , RR-0142 , RR-0113 , RR-0332 , RR-0208 , RR-0225 , RR-0125 , RR-0051 , RR-0145 , RR-0261 , RR-0285 , RR-0100 , RR-0206 , RR-0083 , RR-0165 , RR-0214 , RR-0187 , RR-0061 , RR-0163 , RR-0181 , RR-0270 , RR-0120 , RR-0094 , RR-0183 , RR-0177 , RR-0314 , RR-0099 , RR-0302 , RR-0298 , RR-0350 , RR-0123 , RR-0169 , RR-0151 , RR-0323 , RR-0287 , RR-0318 , RR-0056 , RR-0180 , RR-0159 , RR-0089 , RR-0241 , RR-0308 , RR-0086 , RR-0275 , RR-0054 , RR-0223 , RR-0218 , RR-0226 , RR-0286 , RR-0128 , RR-0053 , RR-0315 , RR-0068 , RR-0173 , RR-0199 , RR-0118 , RR-0156 , RR-0256 , RR-0236 , RR-0153 , RR-0141 , RR-0269 , RR-0240 , RR-0266 , RR-0175 , RR-0227 , RR-0096 , RR-0243 , RR-0152 , RR-0045 , RR-0338 , RR-0221 , RR-0280 , RR-0041 , RR-0178 , RR-0160 , RR-0307 , RR-0121 , RR-0155 , RR-0250 , RR-0232 , RR-0062 , RR-0305 , RR-0129 , RR-0081 , RR-0196 , RR-0040 , RR-0138 , RR-0258 , RR-0201 , RR-0131 , RR-0073 , RR-0231 , RR-0069 , RR-0245 , RR-0108 , RR-0192 , RR-0273 , RR-0082 , RR-0126 , RR-0249 , RR-0265 , RR-0103 , RR-0283 , RR-0170 , RR-0310 , RR-0047 , RR-0333 , RR-0303 , RR-0164 , RR-0052 , RR-0093 , RR-0257 , RR-0324 , RR-0327 , RR-0074 , RR-0058 , RR-0228 , RR-0222 , RR-0197 , RR-0328 , RR-0137 , RR-0346 , RR-0072 , RR-0322 , RR-0158 , RR-0284 , RR-0229 , RR-0136 , RR-0090 , RR-0216 , RR-0204 , RR-0075 , RR-0301 , RR-0148 , RR-0144 , RR-0622 , RR-0556 , RR-0566 , RR-0454 , RR-0506 , RR-0377 , RR-0547 , RR-0567 , RR-0354 , RR-0626 , RR-0404 , RR-0432 , RR-0389 , RR-0398 , RR-0468 , RR-0488 , RR-0530 , RR-0620 , RR-0395 , RR-0391 , RR-0452 , RR-0363 , RR-0371 , RR-0456 , RR-0541 , RR-0531 , RR-0513 , RR-0394 , RR-0579 , RR-0471 , RR-0423 , RR-0554 , RR-0401 , RR-0483 , RR-0594 , RR-0457 , RR-0446 , RR-0470 , RR-0393 , RR-0529 , RR-0539 , RR-0521 , RR-0588 , RR-0482 , RR-0519 , RR-0573 , RR-0418 , RR-0600 , RR-0494 , RR-0466 , RR-0397 , RR-0602 , RR-0433 , RR-0409 , RR-0568 , RR-0351 , RR-0453 , RR-0570 , RR-0624 , RR-0596 , RR-0551 , RR-0443 , RR-0525 , RR-0499 , RR-0517 , RR-0593 , RR-0364 , RR-0465 , RR-0614 , RR-0478 , RR-0458 , RR-0514 , RR-0528 , RR-0361 , RR-0441 , RR-0615 , RR-0376 , RR-0486 , RR-0538 , RR-0565 , RR-0484 , RR-0374 , RR-0618 , RR-0619 , RR-0430 , RR-0445 , RR-0474 , RR-0489 , RR-0560 , RR-0595 , RR-0616 , RR-0434 , RR-0558 , RR-0497 , RR-0572 , RR-0545 , RR-0408 , RR-0504 , RR-0414 , RR-0509 , RR-0540 , RR-0390 , RR-0597 , RR-0601 , RR-0360 , RR-0386 , RR-0428 , RR-0464 , RR-0599 , RR-0589 , RR-0387 , RR-0542 , RR-0479 , RR-0503 , RR-0359 , RR-0429 , RR-0500 , RR-0410 , RR-0510 , RR-0533 , RR-0526 , RR-0592 , RR-0352 , RR-0472 , RR-0413 , RR-0385 , RR-0419 , RR-0621 , RR-0373 , RR-0580 , RR-0564 , RR-0357 , RR-0400 , RR-0355 , RR-0451 , RR-0523 , RR-0412 , RR-0411 , RR-0399 , RR-0606 , RR-0480 , RR-0421 , RR-0439 , RR-0467 , RR-0369 , RR-0420 , RR-0403 , RR-0512 , RR-0362 , RR-0537 , RR-0367 , RR-0435 , RR-0424 , RR-0598 , RR-0544 , RR-0375 , RR-0438 , RR-0358 , RR-0382 , RR-0437 , RR-0475 , RR-0605 , RR-0381 , RR-0396 , RR-0368 , RR-0459 , RR-0455 , RR-0436 , RR-0491 , RR-0576 , RR-0496 , RR-0444 , RR-0481 , RR-0611 , RR-0549 , RR-0450 , RR-0415 , RR-0520 , RR-0498 , RR-0608 , RR-0582 , RR-0505 , RR-0442 , RR-0392 , RR-0507 , RR-0553 , RR-0402 , RR-0425 , RR-0427 , RR-0492 , RR-0366 , RR-0461 , RR-0469 , RR-0462 , RR-0511 , RR-0623 , RR-0575 , RR-0527 , RR-0552 , RR-0578 , RR-0422 , RR-0356 , RR-0431 , RR-0655 , RR-0627 , RR-0628 , RR-0654 , RR-0648 , RR-0711 , RR-0717 , RR-0696 , RR-0635 , RR-0715 , RR-0653 , RR-0647 , RR-0631 , RR-0649 , RR-0632 , RR-0718 , RR-0680 , RR-0716 , RR-0644 , RR-0641 , RR-0692 , RR-0658 , RR-0704 , RR-0646 , RR-0674 , RR-0661 , RR-0634 , RR-0650 , RR-0709 , RR-0690 , RR-0629 , RR-0637 , RR-0700 , RR-0703 , RR-0722 , RR-0702 , RR-0689 , RR-0671 , RR-0708 , RR-0698 , RR-0694 , RR-0667 , RR-0659 , RR-0638 , RR-0645 , RR-0663 , RR-0664 , RR-0705 , RR-0676 , RR-0662 , RR-0710 , RR-0679 , RR-0652 , RR-0683 , RR-0672 , RR-0670 , RR-0699 , RR-0687 , RR-0673 , RR-0707 , RR-0639 , RR-0682 , RR-0669 , RR-0693 , RR-0691 , RR-

Summary of Comment Received	Relevant Representation Reference Number
	0668 , RR-0684 , RR-0686 , RR-0640 , RR-0712 , RR-0657 , RR-0713 , RR-0697 , RR-0761 , RR-0735 , RR-0727 , RR-0636 , RR-0757 , RR-0743 , RR-0746 , RR-0726 , RR-0744 , RR-0732 , RR-0755 , RR-0731 , RR-0736 , RR-0725 , RR-0753 , RR-0748 , RR-0723 , RR-0740 , RR-0758 , RR-0737 , RR-0763 , RR-0742 , RR-0752 , RR-0762 , RR-0738 , RR-0745 , RR-0750 , RR-0747 , RR-0728 , RR-0734 , RR-0754 , RR-0724 , RR-0756 , RR-0741 , RR-0759 , RR-0781 , RR-0766 , RR-0764 , RR-0769 , RR-0776 , RR-0775 , RR-0772 , RR-0788 , RR-0773 , RR-0770 , RR-0779 , RR-0768 , RR-0767 , RR-0765 , RR-0784 , RR-0782 , RR-0789 , RR-0780 , RR-0778 , RR-0777 , RR-0795 , RR-0792 , RR-0800 , RR-0793 , RR-0803 , RR-0805 , RR-0801 , RR-0798 , RR-0799 , RR-0804 , RR-0796 , RR-0802 , RR-0791 , RR-0834 , RR-0825 , RR-0828 , RR-0813 , RR-0833 , RR-0814 , RR-0816 , RR-0826 , RR-0823 , RR-0837 , RR-0839 , RR-0810 , RR-0819 , RR-0829 , RR-0832 , RR-0822 , RR-0831 , RR-0818 , RR-0811 , RR-0815 , RR-0824 , RR-0848 , RR-0845 , RR-0853 , RR-0857 , RR-0849 , RR-0841 , RR-0847 , RR-0843 , RR-1311 , RR-1272 , RR-1295 , RR-1333 , RR-1329 , RR-1183 , RR-1387 , RR-1276 , RR-1314 , RR-1158 , RR-1227 , RR-1170 , RR-1347 , RR-1331 , RR-1163 , RR-1218 , RR-1297 , RR-1390 , RR-1299 , RR-1205 , RR-1150 , RR-1326 , RR-1191 , RR-1300 , RR-1148 , RR-1169 , RR-1278 , RR-1362 , RR-1336 , RR-1222 , RR-1361 , RR-1252 , RR-1303 , RR-1197 , RR-1270 , RR-1259 , RR-1366 , RR-1359 , RR-1186 , RR-1239 , RR-1204 , RR-1210 , RR-1301 , RR-1161 , RR-1232 , RR-1164 , RR-1384 , RR-1370 , RR-1216 , RR-1379 , RR-1321 , RR-1226 , RR-0279 , RR-1215 , RR-1147 , RR-1166 , RR-1339 , RR-1263 , RR-1192 , RR-1284 , RR-1152 , RR-1293 , RR-1261 , RR-1143 , RR-1156 , RR-1240 , RR-1201 , RR-1354 , RR-1353 , RR-1328 , RR-1290 , RR-1401 , RR-1378 , RR-1343 , RR-1179 , RR-1283 , RR-1275 , RR-1176 , RR-1219 , RR-1155 , RR-1184 , RR-1168 , RR-1327 , RR-1207 , RR-1357 , RR-1145 , RR-1173 , RR-1241 , RR-1271 , RR-0749 , RR-1247 , RR-1367 , RR-1394 , RR-1144 , RR-1171 , RR-1355 , RR-1253 , RR-1256 , RR-1178 , RR-1315 , RR-1251 , RR-1196 , RR-1287 , RR-1211 , RR-1229 , RR-1281 , RR-1320 , RR-1188 , RR-1249 , RR-1242 , RR-1369 , RR-1291 , RR-1386 , RR-1193 , RR-1154 , RR-1199 , RR-1344 , RR-1302 , RR-1213 , RR-1206 , RR-1195 , RR-1399 , RR-1391 , RR-1351 , RR-1187 , RR-1372 , RR-1217 , RR-1160 , RR-1245 , RR-1146 , RR-1244 , RR-1316 , RR-1149 , RR-1260 , RR-1262 , RR-1238 , RR-1371 , RR-1332 , RR-1373 , RR-1395 , RR-1230 , RR-1335 , RR-1177 , RR-1250 , RR-1309 , RR-1304 , RR-1194 , RR-1212 , RR-1175 , RR-1172 , RR-1292 , RR-1225 , RR-1200 , RR-1157 , RR-1165 , RR-1313 , RR-1181 , RR-0516 , RR-1267 , RR-1340 , RR-1286 , RR-1209 , RR-1318 , RR-1266 , RR-1151 , RR-1285 , RR-1234 , RR-1392 , RR-1375 , RR-1389 , RR-1233 , RR-1231 , RR-1310 , RR-1243 , RR-1323 , RR-1334 , RR-1348 , RR-1174 , RR-1277 , RR-1308 , RR-1202 , RR-1167 , RR-1255 , RR-1522 , RR-1503 , RR-1506 , RR-1406 , RR-1479 , RR-0633 , RR-1433 , RR-1499 , RR-1469 , RR-1520 , RR-1431 , RR-1468 , RR-1441 , RR-1410 , RR-1487 , RR-1532 , RR-1413 , RR-1460 , RR-1426 , RR-1501 , RR-1409 , RR-1482 , RR-1437 , RR-1488 , RR-1519 , RR-1405 , RR-1481 , RR-1438 , RR-1415 , RR-1417 , RR-1403 , RR-1472 , RR-1489 , RR-1453 , RR-1498 , RR-1509 , RR-1465 , RR-1492 , RR-1500 , RR-1455 , RR-1474 , RR-1411 , RR-1420 , RR-1446 , RR-1494 , RR-1471 , RR-1457 , RR-1412 , RR-1515 , RR-1408 , RR-1497 , RR-1484 , RR-1513 , RR-1466 , RR-1473 , RR-1512 , RR-1462 , RR-1447 , RR-1427 , RR-1470 , RR-1456 , RR-1529 , RR-1516 , RR-1449 , RR-1444 , RR-1425 , RR-1434 , RR-1475 , RR-1443 , RR-1467 , RR-1464 , RR-1461 , RR-1517 , RR-1514 , RR-1496 , RR-1476 , RR-1463 , RR-1424 , RR-1418 , RR-1436 , RR-1419 , RR-1450 , RR-1531 , RR-1440 , RR-1528 , RR-1504 , RR-1511 , RR-1454 , RR-1510 , RR-1530 , RR-1480 , RR-1533 , RR-1423 , RR-1445 , RR-1404 , RR-1439 , RR-1579 , RR-1541 , RR-1552 , RR-1610 , RR-1604 , RR-1570 , RR-1576 , RR-1550 , RR-1587 , RR-1600 , RR-1554 , RR-1573 , RR-0379 , RR-0885 , RR-0899 , RR-0907 , RR-0903 , RR-0906 , RR-0918 , RR-0921 , RR-0920 , RR-0915 , RR-0916 , RR-0919 , RR-0917 , RR-0914 , RR-0923 , RR-0925 , RR-0922 , RR-0934 , RR-0931 , RR-0927 , RR-0930 , RR-0929 , RR-0926 , RR-0936 , RR-

Summary of Comment Received	Relevant Representation Reference Number
	0938 , RR-0940 , RR-0941 , RR-0937 , RR-0949 , RR-0946 , RR-0944 , RR-0943 , RR-0950 , RR-0947 , RR-0951 , RR-0948 , RR-0952 , RR-0953 , RR-0958 , RR-0955 , RR-0957 , RR-0956 , RR-0961 , RR-0970 , RR-0969 , RR-0964 , RR-0963 , RR-0965 , RR-0967 , RR-0960 , RR-0962 , RR-0968 , RR-0995 , RR-0994 , RR-0981 , RR-0976 , RR-0971 , RR-0992 , RR-0975 , RR-0988 , RR-0974 , RR-0984 , RR-0986 , RR-0983 , RR-0977 , RR-0978 , RR-0973 , RR-0989 , RR-0997 , RR-0993 , RR-0991 , RR-0996 , RR-0987 , RR-0998 , RR-0980 , RR-1005 , RR-1006 , RR-1015 , RR-1010 , RR-1007 , RR-1011 , RR-1002 , RR-1012 , RR-0999 , RR-1016 , RR-1013 , RR-1004 , RR-1000 , RR-1028 , RR-1030 , RR-1022 , RR-1026 , RR-1020 , RR-1029 , RR-1018 , RR-1027 , RR-1021 , RR-1031 , RR-1025 , RR-1017 , RR-1035 , RR-1039 , RR-1042 , RR-1034 , RR-1036 , RR-1049 , RR-1033 , RR-1038 , RR-1037 , RR-1048 , RR-1044 , RR-1059 , RR-1057 , RR-1051 , RR-1056 , RR-1050 , RR-1066 , RR-1079 , RR-1126 , RR-1119 , RR-1052 , RR-1101 , RR-1093 , RR-1123 , RR-1067 , RR-1075 , RR-1124 , RR-1081 , RR-1084 , RR-1107 , RR-1092 , RR-1087 , RR-1117 , RR-1134 , RR-1132 , RR-1112 , RR-1073 , RR-1139 , RR-1122 , RR-1125 , RR-1104 , RR-1068 , RR-1083 , RR-1090 , RR-1114 , RR-1072 , RR-1085 , RR-1071 , RR-1074 , RR-1070 , RR-1135 , RR-1076 , RR-1097 , RR-1113 , RR-1140 , RR-1116 , RR-1080 , RR-1130 , RR-1129 , RR-1106 , RR-1096 , RR-1078 , RR-1141 , RR-1109 , RR-1064 , RR-1118 , RR-1131 , RR-1103 , RR-1091 , RR-1077 , RR-1102 , RR-1063 , RR-1099 , RR-1094 , RR-1069 , RR-1133 , RR-1115 , RR-1128 , RR-1095 , RR-1108 , RR-1345 , RR-1324 , RR-1346 , RR-1388 , RR-1279 , RR-1289 , RR-0855 , RR-0868 , RR-0869 , RR-0862 , RR-0865 , RR-0870 , RR-0871 , RR-0874 , RR-0879 , RR-0875 , RR-0882 , RR-0877 , RR-0883 , RR-0880 , RR-0872 , RR-0027 , RR-0893 , RR-1221 , RR-1273 , RR-1246 , RR-1396 , RR-1189 , RR-0002 , RR-1236 , RR-1208 , RR-1356 , RR-1282 , RR-1398 , RR-1153 , RR-1248 , RR-1294 , RR-0892 , RR-0888 , RR-0889 , RR-1589 , RR-1614 , RR-1599 , RR-1621 , RR-1547 , RR-1563 , RR-1595 , RR-1562 , RR-1577 , RR-1567 , RR-1569 , RR-1619 , RR-0532 , RR-1608 , RR-1565 , RR-1613 , RR-1597 , RR-1558 , RR-1585 , RR-1574 , RR-1609 , RR-1548 , RR-1549 , RR-1561 , RR-1540 , RR-1564 , RR-1593 , RR-1578 , RR-1560 , RR-1538 , RR-1568 , RR-1539 , RR-1603 , RR-1592 , RR-1624 , RR-1617 , RR-1543 , RR-1566 , RR-1598 , RR-1625 , RR-1575 , RR-1535 , RR-1572 , RR-1556 , RR-1553 , RR-1618 , RR-1545 , RR-1612 , RR-1602 , RR-1666 , RR-1836 , RR-1766 , RR-1809 , RR-1731 , RR-1857 , RR-1834 , RR-1660 , RR-1670 , RR-1850 , RR-1712 , RR-1677 , RR-1759 , RR-1716 , RR-1715 , RR-1710 , RR-1827 , RR-1743 , RR-1898 , RR-1702 , RR-1683 , RR-1758 , RR-0133 , RR-1821 , RR-1723 , RR-1727 , RR-1882 , RR-1633 , RR-1757 , RR-1802 , RR-1832 , RR-1703 , RR-1859 , RR-1880 , RR-1867 , RR-1649 , RR-1804 , RR-1872 , RR-1806 , RR-1638 , RR-1694 , RR-1714 , RR-1801 , RR-1767 , RR-1858 , RR-1823 , RR-1656 , RR-1755 , RR-1866 , RR-1648 , RR-1753 , RR-1746 , RR-1839 , RR-1918 , RR-1908 , RR-1679 , RR-1851 , RR-1673 , RR-1682 , RR-1777 , RR-1733 , RR-1654 , RR-1784 , RR-1829 , RR-1752 , RR-1805 , RR-1812 , RR-1874 , RR-1905 , RR-1794 , RR-1671 , RR-1845 , RR-1768 , RR-1781 , RR-1885 , RR-1645 , RR-1826 , RR-1815 , RR-1791 , RR-1647 , RR-1732 , RR-1641 , RR-1651 , RR-1808 , RR-1873 , RR-1704 , RR-1868 , RR-1708 , RR-1689 , RR-1793 , RR-1713 , RR-1865 , RR-1914 , RR-1799 , RR-1744 , RR-1779 , RR-1669 , RR-1800 , RR-1698 , RR-1917 , RR-1627 , RR-1818 , RR-1895 , RR-1724 , RR-1639 , RR-1824 , RR-1664 , RR-1667 , RR-1762 , RR-1687 , RR-1820 , RR-0027 , RR-1921 , RR-1776 , RR-1772 , RR-1778 , RR-1662 , RR-1863 , RR-1881 , RR-1860 , RR-1642 , RR-1705 , RR-1894 , RR-1697 , RR-1816 , RR-1807 , RR-1797 , RR-1785 , RR-1904 , RR-1700 , RR-1675 , RR-1691 , RR-1749 , RR-1632 , RR-1678 , RR-1720 , RR-1916 , RR-1788 , RR-1760 , RR-1692 , RR-1913 , RR-1835 , RR-1636 , RR-1887 , RR-1855 , RR-2066 , RR-2121 , RR-1973 , RR-2273 , RR-2247 , RR-1966 , RR-1965 , RR-2210 , RR-2285 , RR-1998 , RR-2323 , RR-2015 , RR-2269 , RR-2258 , RR-1983 , RR-2100 , RR-2072 , RR-1924 , RR-2297 , RR-2081 , RR-2223 , RR-1629 , RR-1773 , RR-1734 , RR-1631 , RR-1775 , RR-1782 , RR-1730 , RR-1685 , RR-1637 , RR-

Summary of Comment Received	Relevant Representation Reference Number
	<p>1848 , RR-1871 , RR-1696 , RR-1876 , RR-1915 , RR-1650 , RR-1668 , RR-1695 , RR-1810 , RR-1729 , RR-1817 , RR-1657 , RR-0416 , RR-1701 , RR-1869 , RR-1870 , RR-1831 , RR-1684 , RR-1707 , RR-1643 , RR-1842 , RR-1644 , RR-1906 , RR-1640 , RR-1789 , RR-1711 , RR-1739 , RR-1862 , RR-1737 , RR-1828 , RR-1877 , RR-1630 , RR-1674 , RR-1902 , RR-1750 , RR-1889 , RR-1680 , RR-0278 , RR-1754 , RR-0448 , RR-0426 , RR-1748 , RR-1717 , RR-1718 , RR-1719 , RR-1735 , RR-1721 , RR-1661 , RR-1893 , RR-1769 , RR-1770 , RR-1688 , RR-1764 , RR-1811 , RR-1946 , RR-2018 , RR-1971 , RR-1990 , RR-2362 , RR-2278 , RR-2028 , RR-2311 , RR-2250 , RR-1967 , RR-2302 , RR-1944 , RR-2046 , RR-2179 , RR-2257 , RR-2146 , RR-2074 , RR-2022 , RR-2122 , RR-2135 , RR-2213 , RR-2196 , RR-2080 , RR-1968 , RR-2217 , RR-2259 , RR-2166 , RR-1982 , RR-2079 , RR-2337 , RR-2165 , RR-2158 , RR-2085 , RR-2054 , RR-2359 , RR-2031 , RR-2357 , RR-2055 , RR-2037 , RR-2011 , RR-2185 , RR-2184 , RR-2215 , RR-2084 , RR-2073 , RR-2270 , RR-2180 , RR-2350 , RR-2314 , RR-2211 , RR-2087 , RR-1927 , RR-1955 , RR-1934 , RR-2131 , RR-2234 , RR-2083 , RR-2228 , RR-2132 , RR-2144 , RR-2214 , RR-2193 , RR-2261 , RR-2125 , RR-2097 , RR-2164 , RR-2093 , RR-2033 , RR-2173 , RR-2120 , RR-2019 , RR-1822 , RR-1690 , RR-1783 , RR-1910 , RR-1886 , RR-1833 , RR-1672 , RR-1738 , RR-1665 , RR-1888 , RR-1659 , RR-1751 , RR-1787 , RR-1653 , RR-1763 , RR-1551 , RR-1611 , RR-1681 , RR-2092 , RR-1991 , RR-1930 , RR-2236 , RR-2335 , RR-2336 , RR-2304 , RR-2325 , RR-2172 , RR-1970 , RR-2321 , RR-1952 , RR-2171 , RR-2032 , RR-2203 , RR-2145 , RR-2024 , RR-1964 , RR-2167 , RR-2064 , RR-2367 , RR-2009 , RR-2190 , RR-2305 , RR-2128 , RR-2139 , RR-1962 , RR-2227 , RR-2368 , RR-2186 , RR-2205 , RR-2288 , RR-1981 , RR-2199 , RR-1957 , RR-2138 , RR-2017 , RR-2059 , RR-1995 , RR-2256 , RR-2183 , RR-1949 , RR-2241 , RR-2051 , RR-2076 , RR-2244 , RR-2142 , RR-2295 , RR-2025 , RR-1974 , RR-1993 , RR-2188 , RR-2030 , RR-2274 , RR-2352 , RR-2067 , RR-2303 , RR-2361 , RR-2130 , RR-2077 , RR-1992 , RR-2319 , RR-1976 , RR-2170 , RR-2177 , RR-2000 , RR-1996 , RR-2355 , RR-2044 , RR-2222 , RR-2068 , RR-2207 , RR-2140 , RR-2324 , RR-1935 , RR-2192 , RR-1979 , RR-2326 , RR-2230 , RR-2169 , RR-2001 , RR-1986 , RR-2189 , RR-2246 , RR-2078 , RR-2112 , RR-2209 , RR-2204 , RR-2330 , RR-2095 , RR-2082 , RR-1961 , RR-1958 , RR-2358 , RR-2053 , RR-1956 , RR-2349 , RR-2042 , RR-2002 , RR-1987 , RR-2105 , RR-2094 , RR-2310 , RR-2159 , RR-2281 , RR-2296 , RR-2049 , RR-2231 , RR-2119 , RR-2026 , RR-2102 , RR-2137 , RR-2157 , RR-2187 , RR-2013 , RR-2238 , RR-2318 , RR-2313 , RR-2224 , RR-2346 , RR-2298 , RR-2287 , RR-2050 , RR-1943 , RR-2327 , RR-2099 , RR-2299 , RR-2127 , RR-2225 , RR-1938 , RR-2110 , RR-2070 , RR-2300 , RR-2151 , RR-2133 , RR-2148 , RR-2322 , RR-2232 , RR-2104 , RR-2272 , RR-2098 , RR-2364 , RR-2134 , RR-2062 , RR-2267 , RR-1950 , RR-2218 , RR-2279 , RR-2338 , RR-2038 , RR-2208 , RR-2181 , RR-2106 , RR-2161 , RR-2216 , RR-2206 , RR-2329 , RR-2369 , RR-2129 , RR-2052 , RR-1959 , RR-1936 , RR-2254 , RR-1941 , RR-2029 , RR-2040 , RR-1939 , RR-2048 , RR-2103 , RR-2057 , RR-2162 , RR-2045 , RR-2276 , RR-2143 , RR-1846 , RR-2056 , RR-2301 , RR-2263 , RR-1994 , RR-2047 , RR-2155 , RR-2086 , RR-2212 , RR-2124 , RR-2202 , RR-1926 , RR-2147 , RR-1988 , RR-2320 , RR-2239 , RR-2242 , RR-2023 , RR-2312 , RR-1932 , RR-1937 , RR-1663 , RR-0887 , RR-2289 , RR-1619 , RR-2150 , RR-2153 , RR-2284 , RR-1945 , RR-1925 , RR-1960 , RR-2370 , RR-2020 , RR-1948 , RR-1972 , RR-1989 , RR-2021 , RR-1997 , RR-2117 , RR-2286 , RR-2194 , RR-2351 , RR-1953 , RR-2090 , RR-2096 , RR-2058 , RR-2035 , RR-2197 , RR-2107 , RR-2136 , RR-1975 , RR-1040 , RR-1364 , RR-1896 , RR-2201 , RR-2088 , RR-2220 , RR-1911 , RR-0584 , RR2372AS , RR2374AS , RR2375AS</p>

Summary of Comment Received	Relevant Representation Reference Number
<p>UNESCO's international advisers say the Scheme should not go ahead in its present form.</p>	<p>RR-0009 , RR-0034 , RR-0162 , RR-0070 , RR-0161 , RR-0300 , RR-0294 , RR-0110 , RR-0278 , RR-0248 , RR-0247 , RR-0135 , RR-0185 , RR-0255 , RR-0233 , RR-0331 , RR-0039 , RR-0344 , RR-0038 , RR-0326 , RR-0130 , RR-0115 , RR-0104 , RR-0194 , RR-0219 , RR-0067 , RR-0116 , RR-0150 , RR-0057 , RR-0046 , RR-0217 , RR-0242 , RR-0091 , RR-0174 , RR-0191 , RR-0252 , RR-0259 , RR-0124 , RR-0063 , RR-0077 , RR-0200 , RR-0166 , RR-0237 , RR-0244 , RR-0113 , RR-0109 , RR-0261 , RR-0285 , RR-0100 , RR-0206 , RR-0083 , RR-0214 , RR-0296 , RR-0187 , RR-0061 , RR-0293 , RR-0094 , RR-0183 , RR-0177 , RR-0298 , RR-0271 , RR-0251 , RR-0323 , RR-0318 , RR-0159 , RR-0241 , RR-0086 , RR-0275 , RR-0223 , RR-0286 , RR-0128 , RR-0053 , RR-0068 , RR-0118 , RR-0156 , RR-0256 , RR-0236 , RR-0243 , RR-0221 , RR-0280 , RR-0155 , RR-0238 , RR-0062 , RR-0196 , RR-0131 , RR-0192 , RR-0273 , RR-0265 , RR-0310 , RR-0164 , RR-0257 , RR-0222 , RR-0137 , RR-0072 , RR-0284 , RR-0229 , RR-0454 , RR-0567 , RR-0354 , RR-0404 , RR-0468 , RR-0452 , RR-0371 , RR-0541 , RR-0531 , RR-0401 , RR-0446 , RR-0470 , RR-0529 , RR-0482 , RR-0519 , RR-0372 , RR-0515 , RR-0493 , RR-0602 , RR-0624 , RR-0443 , RR-0499 , RR-0364 , RR-0465 , RR-0458 , RR-0514 , RR-0441 , RR-0486 , RR-0565 , RR-0484 , RR-0619 , RR-0445 , RR-0474 , RR-0489 , RR-0560 , RR-0434 , RR-0586 , RR-0572 , RR-0408 , RR-0504 , RR-0540 , RR-0601 , RR-0386 , RR-0359 , RR-0429 , RR-0592 , RR-0472 , RR-0400 , RR-0451 , RR-0523 , RR-0559 , RR-0421 , RR-0467 , RR-0403 , RR-0512 , RR-0435 , RR-0463 , RR-0544 , RR-0583 , RR-0438 , RR-0381 , RR-0396 , RR-0455 , RR-0436 , RR-0477 , RR-0481 , RR-0563 , RR-0608 , RR-0505 , RR-0501 , RR-0492 , RR-0585 , RR-0356 , RR-0431 , RR-0655 , RR-0627 , RR-0648 , RR-0635 , RR-0632 , RR-0716 , RR-0692 , RR-0674 , RR-0661 , RR-0650 , RR-0629 , RR-0708 , RR-0694 , RR-0638 , RR-0663 , RR-0664 , RR-0705 , RR-0676 , RR-0662 , RR-0639 , RR-0693 , RR-0657 , RR-0697 , RR-0761 , RR-0743 , RR-0732 , RR-0753 , RR-0748 , RR-0763 , RR-0742 , RR-0739 , RR-0752 , RR-0728 , RR-0769 , RR-0772 , RR-0788 , RR-0773 , RR-0779 , RR-0767 , RR-0782 , RR-0778 , RR-0795 , RR-0793 , RR-0803 , RR-0801 , RR-0802 , RR-0836 , RR-0813 , RR-0829 , RR-0832 , RR-0822 , RR-0831 , RR-0827 , RR-0857 , RR-0849 , RR-0843 , RR-1311 , RR-1272 , RR-1329 , RR-1276 , RR-1158 , RR-1170 , RR-1347 , RR-1218 , RR-1148 , RR-1278 , RR-1362 , RR-1336 , RR-1222 , RR-1361 , RR-1182 , RR-1270 , RR-1239 , RR-1204 , RR-1210 , RR-0281 , RR-1301 , RR-1232 , RR-1216 , RR-1166 , RR-1152 , RR-1240 , RR-1353 , RR-1290 , RR-1401 , RR-1179 , RR-1155 , RR-1357 , RR-1145 , RR-1241 , RR-1198 , RR-1325 , RR-1256 , RR-1315 , RR-1211 , RR-1320 , RR-1291 , RR-1386 , RR-1154 , RR-1213 , RR-1187 , RR-1217 , RR-1262 , RR-1238 , RR-1371 , RR-1395 , RR-1250 , RR-1309 , RR-1304 , RR-1165 , RR-1313 , RR-0516 , RR-1286 , RR-1380 , RR-1209 , RR-1375 , RR-1277 , RR-1308 , RR-1479 , RR-0633 , RR-1433 , RR-1491 , RR-1532 , RR-1426 , RR-1519 , RR-1405 , RR-1417 , RR-1472 , RR-1453 , RR-1465 , RR-1500 , RR-1455 , RR-1420 , RR-1497 , RR-1466 , RR-1447 , RR-1427 , RR-1529 , RR-1425 , RR-1467 , RR-1461 , RR-1517 , RR-1514 , RR-1496 , RR-1436 , RR-1440 , RR-1528 , RR-1511 , RR-1480 , RR-1610 , RR-0906 , RR-0918 , RR-0919 , RR-0914 , RR-0927 , RR-0929 , RR-0936 , RR-0941 , RR-0949 , RR-0944 , RR-0943 , RR-0955 , RR-0970 , RR-0969 , RR-0964 , RR-0963 , RR-0994 , RR-0981 , RR-0988 , RR-0974 , RR-0986 , RR-0997 , RR-0991 , RR-0996 , RR-0987 , RR-1002 , RR-1000 , RR-1019 , RR-1030 , RR-1022 , RR-1020 , RR-1035 , RR-1056 , RR-1136 , RR-1126 , RR-1119 , RR-1052 , RR-1093 , RR-1121 , RR-1081 , RR-1111 , RR-1084 , RR-1117 , RR-1112 , RR-1104 , RR-1114 , RR-1074 , RR-1120 , RR-1135 , RR-1076 , RR-1113 , RR-1116 , RR-1082 , RR-1130 , RR-1096 , RR-1109 , RR-1064 , RR-1118 , RR-1091 , RR-1102 , RR-1099 , RR-1095 , RR-1346 , RR-1388 , RR-1289 , RR-0855 , RR-0868 , RR-0862 , RR-0870 , RR-0871 , RR-0879 , RR-0877 , RR-0883 , RR-0880 , RR-1221 , RR-1189 , RR-1162 , RR-1236 , RR-1398 , RR-1153 , RR-1248 , RR-1294 , RR-0889 , RR-1589 , RR-1614 , RR-1621 , RR-1619 , RR-1616 , RR-1560 , RR-1568 , RR-1539 , RR-1624 , RR-</p>

Summary of Comment Received	Relevant Representation Reference Number
	<p>1598 , RR-1575 , RR-1535 , RR-1556 , RR-1553 , RR-1596 , RR-1602 , RR-1731 , RR-1834 , RR-1660 , RR-1919 , RR-1712 , RR-1677 , RR-1852 , RR-1715 , RR-1710 , RR-1743 , RR-1683 , RR-1758 , RR-1821 , RR-1882 , RR-1633 , RR-1832 , RR-1859 , RR-1867 , RR-1649 , RR-1804 , RR-1872 , RR-1806 , RR-1638 , RR-1767 , RR-1858 , RR-1755 , RR-1866 , RR-1746 , RR-1839 , RR-1918 , RR-1851 , RR-1673 , RR-1682 , RR-1733 , RR-1784 , RR-1752 , RR-1874 , RR-1768 , RR-1841 , RR-1914 , RR-1744 , RR-1698 , RR-1917 , RR-1655 , RR-1895 , RR-1724 , RR-1824 , RR-1664 , RR-1762 , RR-1820 , RR-1921 , RR-1844 , RR-1778 , RR-1863 , RR-1780 , RR-1705 , RR-1697 , RR-1816 , RR-1807 , RR-1700 , RR-1678 , RR-1720 , RR-1788 , RR-1887 , RR-1855 , RR-2121 , RR-1973 , RR-2273 , RR-1966 , RR-1965 , RR-2285 , RR-2258 , RR-2297 , RR-2223 , RR-1803 , RR-1734 , RR-1685 , RR-1637 , RR-1696 , RR-1915 , RR-1650 , RR-1695 , RR-1657 , RR-1869 , RR-1870 , RR-1831 , RR-1684 , RR-1707 , RR-1643 , RR-1644 , RR-1906 , RR-1640 , RR-1676 , RR-1862 , RR-1771 , RR-1630 , RR-1838 , RR-1674 , RR-1902 , RR-1889 , RR-0426 , RR-1748 , RR-1717 , RR-1718 , RR-1719 , RR-1661 , RR-1893 , RR-1769 , RR-1764 , RR-1946 , RR-2028 , RR-2311 , RR-2250 , RR-1967 , RR-2302 , RR-2122 , RR-2135 , RR-2291 , RR-2166 , RR-2165 , RR-2158 , RR-2054 , RR-2011 , RR-2185 , RR-2184 , RR-2073 , RR-2270 , RR-2350 , RR-1927 , RR-2083 , RR-2214 , RR-2193 , RR-2125 , RR-2097 , RR-2164 , RR-2033 , RR-2173 , RR-2120 , RR-2019 , RR-1690 , RR-1854 , RR-1783 , RR-1910 , RR-1886 , RR-1672 , RR-1738 , RR-1665 , RR-1888 , RR-1751 , RR-1653 , RR-1611 , RR-2092 , RR-2172 , RR-2171 , RR-2167 , RR-2064 , RR-2367 , RR-2305 , RR-2227 , RR-2368 , RR-2205 , RR-1981 , RR-2138 , RR-2256 , RR-2183 , RR-1949 , RR-2241 , RR-2025 , RR-2188 , RR-2030 , RR-2274 , RR-2361 , RR-1976 , RR-2177 , RR-2000 , RR-1963 , RR-2044 , RR-2207 , RR-2192 , RR-2209 , RR-2204 , RR-2330 , RR-2082 , RR-2358 , RR-2349 , RR-2026 , RR-2137 , RR-2065 , RR-2346 , RR-1943 , RR-2099 , RR-1938 , RR-2070 , RR-2300 , RR-2148 , RR-2104 , RR-2272 , RR-2364 , RR-2218 , RR-2279 , RR-2338 , RR-2292 , RR-2181 , RR-2106 , RR-2216 , RR-2029 , RR-2048 , RR-2103 , RR-2162 , RR-2045 , RR-2276 , RR-2143 , RR-2056 , RR-1994 , RR-2047 , RR-1984 , RR-2155 , RR-2195 , RR-2342 , RR-2328 , RR-2239 , RR-2242 , RR-1937 , RR-2370 , RR-1972 , RR-1989 , RR-1997 , RR-2286 , RR-2008 , RR-2090 , RR-1975 , RR-1040 , RR-2233 , RR2372AS , RR2373AS</p>
<p>Concerns about damage to Blick Mead Mesolithic site and its setting including:</p> <ul style="list-style-type: none"> • No full archaeology assessment has yet been undertaken. • Important remains have already been destroyed by the unauthorised drilling of a borehole on 2nd December 2018 (as per ENV#459) • Archaeologists were not involved in the drilling process and selection of borehole locations. • Blick Mead staff were not informed 	<p>RR-0233 , RR-0331 , RR-0195 , RR-0344 , RR-0205 , RR-0326 , RR-0130 , RR-0219 , RR-0176 , RR-0046 , RR-0242 , RR-0343 , RR-0174 , RR-0191 , RR-0252 , RR-0124 , RR-0143 , RR-0063 , RR-0200 , RR-0237 , RR-0112 , RR-0142 , RR-0145 , RR-0261 , RR-0285 , RR-0100 , RR-0206 , RR-0083 , RR-0214 , RR-0253 , RR-0061 , RR-0120 , RR-0094 , RR-0183 , RR-0298 , RR-0169 , RR-0323 , RR-0318 , RR-2215 , RR-0159 , RR-0089 , RR-0241 , RR-0086 , RR-0286 , RR-0128 , RR-0053 , RR-0068 , RR-0118 , RR-0156 , RR-0256 , RR-0236 , RR-0096 , RR-0325 , RR-0338 , RR-0221 , RR-0041 , RR-0084 , RR-0155 , RR-0062 , RR-0196 , RR-0073 , RR-0192 , RR-0273 , RR-0182 , RR-0170 , RR-0310 , RR-0164 , RR-0213 , RR-0137 , RR-0098 , RR-0284 , RR-0229 , RR-0090 , RR-0454 , RR-0404 , RR-0468 , RR-0620 , RR-0452 , RR-0371 , RR-0531 , RR-0554 , RR-0401 , RR-0446 , RR-0470 , RR-0539 , RR-0482 , RR-0519 , RR-0493 , RR-0602 , RR-0624 , RR-0551 , RR-0443 , RR-0364 , RR-0465 , RR-0458 , RR-0565 , RR-0484 , RR-0619 , RR-0445 , RR-0489 , RR-0558 , RR-0497 , RR-0408 , RR-0476 , RR-0504 , RR-0540 , RR-0601 , RR-0386 , RR-0387 , RR-0359 , RR-0621 , RR-0564 , RR-0357 , RR-0523 , RR-0467 , RR-0369 , RR-0403 , RR-0435 , RR-0544 , RR-0438 , RR-0382 , RR-0381 , RR-0455 , RR-0436 , RR-0611 , RR-0415 , RR-0520 , RR-0608 , RR-0505 , RR-0392 , RR-0427 , RR-0585 , RR-0575 , RR-0356 , RR-0655 , RR-0627 , RR-0648 , RR-0711 , RR-0717 , RR-0715 , RR-0716 , RR-0692 , RR-0634 , RR-0650 , RR-0629 , RR-0694 , RR-0659 , RR-0638 , RR-0663 , RR-0664 , RR-0662 , RR-0682 , RR-0686 , RR-0712 , RR-0657 , RR-0697 , RR-0761 , RR-0735 , RR-0743 , RR-0732 , RR-0753 , RR-0748 , RR-0763 , RR-0742 , RR-0752 ,</p>

Summary of Comment Received	Relevant Representation Reference Number
that the drilling was being undertaken.	RR-0728 , RR-0724 , RR-0756 , RR-0760 , RR-0775 , RR-0772 , RR-0786 , RR-0788 , RR-0770 , RR-0767 , RR-0793 , RR-0801 , RR-0798 , RR-0802 , RR-0813 , RR-0837 , RR-0832 , RR-0822 , RR-0831 , RR-0854 , RR-0853 , RR-0849 , RR-1311 , RR-1214 , RR-1276 , RR-1170 , RR-1347 , RR-1150 , RR-1288 , RR-1278 , RR-1362 , RR-1222 , RR-1182 , RR-1270 , RR-1204 , RR-0281 , RR-1216 , RR-1379 , RR-1298 , RR-1152 , RR-1240 , RR-1353 , RR-1401 , RR-1179 , RR-1235 , RR-1155 , RR-1357 , RR-1145 , RR-1367 , RR-1198 , RR-1325 , RR-1315 , RR-1352 , RR-1320 , RR-1291 , RR-1386 , RR-1213 , RR-1187 , RR-1217 , RR-1262 , RR-1238 , RR-1371 , RR-1177 , RR-1250 , RR-1304 , RR-1212 , RR-1175 , RR-1165 , RR-1313 , RR-1181 , RR-1286 , RR-1312 , RR-1375 , RR-1334 , RR-1277 , RR-1308 , RR-0633 , RR-1485 , RR-1469 , RR-1520 , RR-1478 , RR-1426 , RR-1417 , RR-1453 , RR-1498 , RR-1500 , RR-1455 , RR-1505 , RR-1408 , RR-1484 , RR-1451 , RR-1447 , RR-1470 , RR-1508 , RR-1449 , RR-1425 , RR-1434 , RR-1477 , RR-1461 , RR-1514 , RR-1418 , RR-1436 , RR-1440 , RR-1528 , RR-1504 , RR-1511 , RR-1480 , RR-1533 , RR-1404 , RR-1610 , RR-0906 , RR-0918 , RR-0914 , RR-0929 , RR-0936 , RR-0941 , RR-0944 , RR-0943 , RR-0950 , RR-0945 , RR-0958 , RR-0957 , RR-0970 , RR-0964 , RR-0960 , RR-0962 , RR-0981 , RR-0988 , RR-0974 , RR-0979 , RR-0986 , RR-0978 , RR-0997 , RR-0991 , RR-0998 , RR-1005 , RR-1010 , RR-1011 , RR-1000 , RR-1030 , RR-1022 , RR-1031 , RR-1035 , RR-1057 , RR-1051 , RR-1060 , RR-1126 , RR-1119 , RR-1081 , RR-1111 , RR-1084 , RR-1112 , RR-1073 , RR-1122 , RR-1104 , RR-1135 , RR-1113 , RR-1116 , RR-1130 , RR-1096 , RR-1064 , RR-1118 , RR-1102 , RR-1128 , RR-1095 , RR-1346 , RR-1388 , RR-1289 , RR-0868 , RR-0870 , RR-0871 , RR-0882 , RR-0877 , RR-0883 , RR-0880 , RR-1221 , RR-1246 , RR-1396 , RR-1208 , RR-1153 , RR-0889 , RR-1589 , RR-1562 , RR-1619 , RR-1564 , RR-1560 , RR-1568 , RR-1624 , RR-1575 , RR-1596 , RR-1602 , RR-1731 , RR-1660 , RR-1712 , RR-1677 , RR-1852 , RR-1759 , RR-1716 , RR-1658 , RR-1710 , RR-1758 , RR-1821 , RR-1727 , RR-1882 , RR-1633 , RR-1859 , RR-1867 , RR-1649 , RR-1804 , RR-1872 , RR-1806 , RR-1638 , RR-1801 , RR-1858 , RR-1656 , RR-1755 , RR-1866 , RR-1746 , RR-1839 , RR-1918 , RR-0928 , RR-1851 , RR-1673 , RR-1682 , RR-1733 , RR-1784 , RR-1752 , RR-1768 , RR-1841 , RR-1744 , RR-1698 , RR-1917 , RR-1895 , RR-1664 , RR-1762 , RR-1921 , RR-1863 , RR-1642 , RR-1705 , RR-1697 , RR-1807 , RR-1700 , RR-1678 , RR-1788 , RR-1692 , RR-1835 , RR-2121 , RR-1973 , RR-2273 , RR-1965 , RR-2285 , RR-2258 , RR-2100 , RR-2297 , RR-1803 , RR-1734 , RR-1631 , RR-1782 , RR-1637 , RR-1696 , RR-1915 , RR-1650 , RR-1695 , RR-1657 , RR-1869 , RR-1870 , RR-1684 , RR-1643 , RR-1644 , RR-1906 , RR-1862 , RR-1630 , RR-1838 , RR-1674 , RR-1902 , RR-0426 , RR-1748 , RR-1717 , RR-1718 , RR-1769 , RR-1946 , RR-2018 , RR-1971 , RR-2028 , RR-2311 , RR-2250 , RR-2302 , RR-1999 , RR-2146 , RR-2022 , RR-2122 , RR-2135 , RR-2080 , RR-2166 , RR-2249 , RR-2054 , RR-2063 , RR-2006 , RR-2011 , RR-2185 , RR-2184 , RR-2114 , RR-2350 , RR-2211 , RR-1927 , RR-2214 , RR-2193 , RR-2125 , RR-2097 , RR-2164 , RR-2033 , RR-2173 , RR-2120 , RR-2019 , RR-1783 , RR-1672 , RR-1738 , RR-1665 , RR-1888 , RR-1751 , RR-1653 , RR-1681 , RR-2172 , RR-2024 , RR-2167 , RR-2367 , RR-2305 , RR-2205 , RR-1981 , RR-2277 , RR-1957 , RR-2138 , RR-2235 , RR-2256 , RR-2241 , RR-2142 , RR-2025 , RR-1974 , RR-2030 , RR-2274 , RR-2319 , RR-2039 , RR-1976 , RR-2170 , RR-1963 , RR-2044 , RR-2207 , RR-2326 , RR-1986 , RR-2209 , RR-2330 , RR-2221 , RR-2358 , RR-2105 , RR-2310 , RR-1929 , RR-2026 , RR-2102 , RR-2137 , RR-2313 , RR-2346 , RR-2298 , RR-2070 , RR-2300 , RR-2133 , RR-2148 , RR-2309 , RR-2104 , RR-2364 , RR-2062 , RR-1950 , RR-2279 , RR-2292 , RR-2181 , RR-2106 , RR-2129 , RR-1959 , RR-1936 , RR-2029 , RR-2007 , RR-2103 , RR-2162 , RR-2045 , RR-2056 , RR-1994 , RR-2047 , RR-1984 , RR-2155 , RR-2342 , RR-2202 , RR-1926 , RR-2328 , RR-2239 , RR-2242 , RR-2150 , RR-2353 , RR-2370 , RR-1989 , RR-1591 , RR-2096 , RR-1975 , RR-1040 , RR-1536 , RR-2233 , RR2372AS

If you need help accessing this or any other Highways England information, please call **0300 123 5000** and we will help you.

© Crown copyright 2017.

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence: visit www.nationalarchives.gov.uk/doc/open-government-licence/ write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email psi@nationalarchives.gsi.gov.uk.

This document is also available on our website at www.gov.uk/highways

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 PR90/17

Highways England creative job number BRS17_0027

*Calls to 03 numbers cost no more than a national rate call to an 01 or 02 number and must count towards any inclusive minutes in the same way as 01 and 02 calls. These rules apply to calls from any type of line including mobile, BT, other fixed line on payphone. Calls may be recorded or monitored.

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ
Highways England Company Limited registered in England and Wales number 09346363