

**Application for an Order granting Development Consent for the A303 Amesbury to Berwick Down
Written Representation on behalf of Philip Sawkill, Tenant of West Amesbury Farm to comply with Deadline 2 imposed by the Examination Authority**

The Applicant in their DCO Application have failed to resolve issues raised in the Consultation Response submitted on 23rd April, a further copy of which is attached at Annex A, re-stated in the Supplementary Consultation dated 14th August 2018, a copy of which is attached at Annex B. I would therefore ask that the Examining Authority investigate in depth why Highways England have not been able to secure the access that is currently available to me to the A303 as after construction I will need to be able to get access to the Countess Road, the only available route which is through Countess Farm.

I have proved and it is accepted that my Combine Harvester is unable to manoeuvre through Amesbury as previously suggested which determines that access through Countess Farm to the Countess Road is a necessity. If I do not get access to the Countess Road this will have severe untold consequences on my business as I would not be able to farm in hand land at Stockport Farm, Amesbury or undertake the contract farming arrangements at Fox Farm, Ampport. A plan showing the respective locations of the areas farmed appears at Annex C.

The Examining Authority should examine the reasons as to why Highways England and the National Trust who own the land at Countess Farm do not appear to have had any meaningful discussions or involve the land owner of Park Farm, West Amesbury whose cooperation will be required to achieve the access to the Countess Road incorporating a route across Park Farm and also examine why as tenant of West Amesbury Farm I too have not been involved in trying to resolve this issue.

Highways England although asked on numerous occasions have not been able to provide any documentary evidence concerning the issue of the land at Countess Farm being potentially inalienable. I believe the Examining Authority should examine this aspect as Countess Farm was purchased on the open market by the National Trust and seek to see the documentary evidence confirming the status of the land at Countess Farm.

Highways England appear unwilling to use the powers available to them to compulsory acquire land at Countess Farm to achieve getting a route out of Park Farm to Countess Farm and potential routes are indicated on the plan at Annex D.

The reasons for their failure to do so should also be examined.

The applicant's proposals for the closure of Stonehenge Road at the location shown on the DCO plans also requires examination as the point of closure is by the main entrance to West Amesbury Farm.

With Stonehenge Road at that point still being a public highway but with no final destination I believe that this area of Stonehenge Road will be used extensively for improper use including fly tipping, parking and camping together with other anti-social uses. This will also substantially increase the risk of the potential illegal activities occurring at West Amesbury Farm. At the same time the risk of potential incidences surrounding livestock which are housed at West Amesbury Farm and Park Farm being potentially in conflict with members of the public is increased and if the intended closure point of Stonehenge Road was moved to the Woodford Valley Junction this also diminishes the risk of farm livestock being subject to theft.

Being resident at No. 1 Park Farm Cottages with a young family, without moving the closure point down to the Woodford Valley Road and with the very likelihood of increase of the use of Stonehenge Road for undesirable activities, this increases the risk to my family which is unacceptable.

A suggestion has been made to Highways England that the point of closure of Stonehenge Road should be at the junction of the Woodford Valley Road which is shown on the attached plan at Annex E. The intended use of the declassified section of Stonehenge Road would not be altered and the owner of Park Farm has offered to assume maintenance for this area, as the principal affected land owner and user. Between the owner of Park Farm Cottages and myself as tenant of West Amesbury Farm we would then have the ability to "control" and maintain that area to our standards rather than have to rely on Wiltshire Council and their diminishing funds. Highways England should examine the applicant as to why no alternative to the proposed closure point of Stonehenge Road has been considered or put forward as a viable alternative.

The Examining Authority should examine further why at the application stage, the Applicant has been unable to provide details as to how utility services such as electricity and water which will inevitably be needed at the eastern portal and along the length of the tunnel will be delivered to site and if my occupation of West Amesbury Farm will be disrupted by either a new water main or electricity supply or a combination of both?

With the exception of these issues which require further examination I give my support to the applicant's Application.

Signed

[Redacted Signature]

.....
Howard Smith MRICS Chartered Surveyor
RICS Valuer

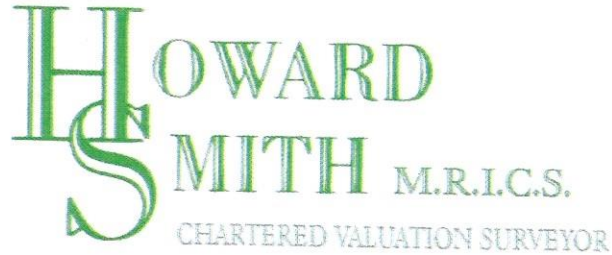
Dated

[Redacted Date]

HOWARD
SMITH M.R.I.C.S.
CHARTERED VALUATION SURVEYOR

ANNEX A

The Consultation Response submitted on 23rd April 2018



**STATUTORY PUBLIC CONSULTATION RESPONSE TO A303 STONEHENGE AMESBURY
TO BERWICK DOWN CONSULTATION BOOKLET DATED FEBRUARY 2018
ON BEHALF OF
WEST AMESBURY FARMS, WEST AMESBURY FARM, SALISBURY, WILTS**

Introduction

Highways England have asked for feedback to the A303 Stonehenge Amesbury to Berwick Down Consultation Booklet dated February 2018. Comments were requested by 23.59 hours Monday 23rd April 2018. The comments in this response solely refer to the eastern section of the proposed Amesbury to Berwick Down A303 and specifically to the issues raised in connection with West Amesbury Farm. The business of West Amesbury Farm is also linked to land owned at Park Farm, West Amesbury, Salisbury, Wilts and Stockport Farm, Amesbury, Salisbury, Wilts. A separate Public Consultation Response has been made by the freehold owner of those properties.

The issues I would like to raise are as follows:-

- a. **Issue 1** – How will West Amesbury Farms be able to operate as inadequate access provisions are shown on the published plan.
- b. **Issue 2** - The intended early closure of Stonehenge Road.
- c. **Issue 3** - The future of the detrunked section of the A303 from Stonehenge Road to Long Barrow Roundabout
- d. **Issue 4** - The affect that the tunnel will have on the hydrology of the area.
- e. **Issue 5** - The lack of clarity concerning the supply of power to the eastern portal.

Issue 1 – How will West Amesbury Farms be able to operate as inadequate access provisions are shown on the published plan

In order to fully understand the impact that the plan as published will have on this business I restate now much of what appeared on the original consultation response dated 3rd March 2017

as although this explanation has been given on many numerous occasions to various staff members and to the Agricultural Consultant it would appear as if none of this has been considered by the time the public consultation document was published.

Before highlighting the areas and issues of concern and in order to try and understand the impact of the tunnel will have on my business I will explain the extent of the farming undertaking and spread of locations.

West Amesbury Farm not only includes West Amesbury Farm, West Amesbury contained within plot 78/16 it also includes land north east of Stonehenge being plot 78/12 and Park Farm, West Amesbury (owned by Mrs P M Sandell) being plot numbers 87/1 and 87/2. Further land amounting to 150 acres is owned at Stockport Farm, Amesbury. I attach a plan showing the location of these farms and have colour blocked the areas of each farm. The main key provides the clarity for each colour used.

In addition to this West Amesbury Farm has a contract farming arrangement on 650 acres at Fox Farm, Amport however, all machinery undertaking the contract farming arrangement for Fox Farm is located at West Amesbury Farm and uses the A303 to travel to and return from the required destination.

West Amesbury Farm and Stockport Farm, Amesbury is farmed using a mix of arable and grassland comprising a three crop rotation of winter wheat, spring barley and oil seed rape and areas of temporary grassland and permanent grassland are used to support a suckler cow herd of 150 animals plus followers which are generally sold at weaning.

The immediate concern is that the A303 has to be accessed to enable my combine to move from West Amesbury Farm to both Stockport Farm and Fox Farm and to be able to return from those farms as well.

We have gone to extraordinary lengths to provide you with the full manufacturers specification of the Combine Harvester that is used to prove access through Amesbury Town Centre as envisaged in the Consultation Booklet is physically not possible. Having provided you with this information there is still no provision for access contained within the plans and it is hoped it is understood that it is essential that West Amesbury Farms has the ability to access the east bound carriageway of the A303 at all times during and post construction without interruption.

It is imperative that I continue to have unimpeded access to both the western and eastern carriageways. Without access being provided my business will not be able to operate and it is also important that the new road does not have any restricted uses applied to it as it is a road that will need to be used by agricultural machinery and equipment in perpetuity without restriction.

The harvested crops from my farms, with the exception of Fox Farm, are all returned for drying and storage at West Amesbury Farm and therefore, when my crops are sold grain lorries need to be able to access my property but also to leave the property and join the A303 quickly and safely to be able to transport the crop to its final destination. It is implied, as there is no provision for alternative access within the Consultation Booklet that all of these vehicle movements are to be routed through Amesbury Town Centre on totally unsuitable roads. At present, all fully laden lorries are advised to join the A303 using the existing arrangements via Stonehenge Road and proceed to the Long Barrow Roundabout and plan their journey accordingly.

Not only do my harvested crops need to leave the farm by using the A303 but I also need access to the "new road" as I sell my livestock generally once or twice a year using sale venues at Salisbury or Frome and therefore, I also need to be able to move these animals to their sale destination in the most efficient and quickest manner possible which is by accessing the A303. Without having access to the "new road" my business will be completely jeopardised by the construction of this tunnel.

Peter Williams the Agricultural Consultant produced agreed Minutes concerning the access requirements for West Amesbury Farms which are attached but to fully understand the importance of adequate access I provided a breakdown of the business undertaken by West Amesbury Farms above.

Furthermore, an approximate breakdown of essential deliveries are: -

Annually there are 170 Tons of Granular Fertiliser that is delivered in 28.6 Ton loads with the articulated lorries carrying out this function being the maximum permissive legal weight load applying in the United Kingdom and therefore, there is 6 such deliveries per annum.

2000 tons of Sewage Cake delivered on appropriate licenced carriers on 20 ton loads which is the equivalent of 100 vehicle movements per annum of this nature.

Each year the farm will sell approximately 2,500 tons of harvested crops which is moved away from the farm on 29 ton loads with the articulated lorries carrying out this function, again being the maximum permitted road weight for the United Kingdom but this also means that there will be 87 lorries arriving in an un-laden state and therefore, there are a total 174 vehicle movements of this nature.

As has previously been said, without suitable access to the A303 as currently envisaged by the Public Consultation Booklet, this traffic which will create its own accompanying issues has no alternative but to be routed through Amesbury Town Centre and this is not practical particularly as all returning agricultural vehicles from operating Stockport Farm, Amesbury would also have to use Amesbury Town Centre which can be avoided by the provision of suitable access to the Countess Road.

The solution to this problem is to provide means of access to the Countess Road which may involve permanently acquiring parts of Countess Farm for this purpose. Countess Farm was purchased outright by the National Trust some years ago and the registered title does not show it has inalienable status. It should therefore be possible for Highways England to compulsorily purchase the parts that are required of Countess Farm to provide the access and furthermore, my research has revealed that in 2004 as a result of the Public Inquiry the Planning Inspector will have signed off a plan that will have included providing access for all agricultural purposes and therefore, this route should be further investigated as the need for access to be provided has not altered.

A plan is attached at Appendix 2 showing a potential route to the Countess Road that will require the permanent acquisition of land from the National Trust

Issue 2 - The intended early closure of Stonehenge Road

It has been stated in the Public Consultation Booklet that Stonehenge Road will be closed off early in the construction process however, no detail has been provided as to exactly how this will be achieved and what other works may be involved that will restrict the ability of West Amesbury Farms to access the eastern carriageway of the A303 to enable my farming operation to continue suffering the least amount of inconvenience possible. The recommendation here is that there needs to be full disclosure of what is intended immediately Stonehenge Road is closed to allow me to be able to continue to operate my business and I have particular concerns as to the future use of the Highways England land known locally as "Sandell's Gap" as all of the problems mentioned previously will become apparent at the early stages of construction without a suitable solution currently available.

As previously stated I also have concerns that Stonehenge Road will need to be opened to allow access to the Custodian Cottages however, at the present time they do not enjoy access directly from Stonehenge Road but directly from the A303 and therefore, for security reasons I would suggest that rights of access need to be from the currently owned National Trust property of which there is a perfectly good hard track from Amesbury which could easily be upgraded. The benefit of this is that Stonehenge Road would then have a very limited use which could then be restricted rather than offer access to land north east of Stonehenge in plot 78/12 and 87/1 which currently is restricted by the A303 roadside fencing. By creating an access to the Custodian Cottages from Stonehenge Road it will open up the area to the north of the road to activities that are currently unlikely to take place such as hare coursing.

Issue 3 – The future of the detrunked section of the A303 from Stonehenge Road to Long Barrow Roundabout

There is insufficient detail about what will come of the abandoned road as the businesses that operate either side of that road have not been approached for their thoughts about the management and use of the detrunked road and there are obviously concerns about maintenance and management of that when it is detrunked.

What also appears to have been conveniently forgotten is that Plot 78/12 which is land north east of Stonehenge is used for cattle grazing and therefore, at all times during construction and post construction access is required and as this is served by mains water the mains water supply also needs to be maintained at all times so that I am not left in a position with over 100 suckler cows and calves being without water.

Whatever is proposed needs to have a sufficiently hard surface to allow agricultural vehicles to move freely along the detrunked road and this will include movements with Combine Harvesters, trailers and other associated grassland equipment.

By creating a green Byway on the detrunked road and by wanting to link the bridleways together south of the A303 the A303 at the present time acts as a barrier and those byways that abut the A303 from the south need to be closed.

Issue 4 - The lack of clarity concerning the supply of power to the eastern portal

It is noted that there is no indication in the Public Consultation Booklet and the same was the position previously in that there is no mention as to how power and in particular electricity is to be delivered to the tunnel which will need lighting at its entry and exit points and as this is an area at present where there is limited light intrusion, I cannot see any indication in the proposed designs for the tunnel portals that this has been sufficiently considered and I am concerned that at my occupation of Park Farm I will now suffer light intrusion as a result of the scheme.

Issue 5 - The affect that the tunnel will have on the hydrology of the area

As I stated in the previous Public Consultation Response I also have major concerns of the affect that the tunnel will have on the hydrology of the area as at the time of the 2002 Inquiry it was established that there is unpredictable hydrology at Stonehenge. At the 2004 Public Inquiry it was shown that the engineering for the then 2.1 kilometres bored tunnel could prove problematical and the Ministerial Statement dated July 2005 A303 Trunk Road (Stonehenge) as reported in Hansard states "very large quantities of phosphatic (soft, weak, chalk) and a high water table, within the ground potentially rising to the surface at times of heavy rainfall where the tunnel passes between a shallow valley to the south of Stonehenge would indicate that hydrology is going to be a problem particularly as ground conditions remain unchanged.

The Public Consultation Booklet and the Non-Technical Summary dated February 2018 clearly give the impression that there will be no effect on hydrology however, figure 5.38 has no detail as to when the maximum recorded water level and minimum recorded water levels were recorded and therefore, the inference is that this must be reliant on old data taken from the previous scheme as monitoring bore holes have only been installed at this time and the water pumping tests have not commenced.

I fail to see how the data produced on page 37 of the Public Consultation Booklet February 2018 is an accurate representation.

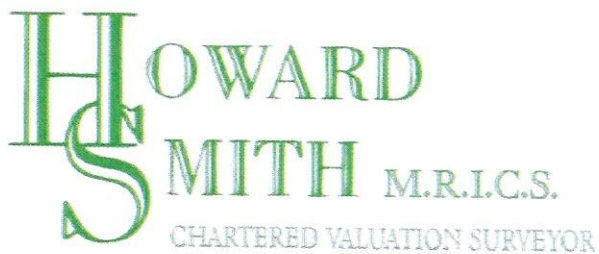
Kate Fielden on the 30th December 2014 in the Ecologist magazine states "The River Avon whose catchment area includes the WHS, is designated as a special area of conservation, protected under European Law (Habitats directive (92/43/EEC)). The designation here is specifically for Annex 1 Habitats for five aquatic Ranunculus species and for Desmoulins's Whorl Snail among Annex 2 species. Water flow and quality are thus of paramount importance. Any decisions on tunnel length, depth and portals will need to take impacts on hydrogeology and ecology into account. There will be drainage during construction work and rain water runoff from completed road surfaces to monitor. Further to these, appropriate measures must be employed to deal with unexpected accidental chemical spills in the vicinity.

From what I have seen in the past Consultation documents there is no such mention of what drainage may or may not be required during construction and how rain water run-off from the construction sites are going to be dealt with and I am not convinced that Highways England yet have sufficient technical information to be able to construct a tunnel without causing a disaster in the hydrology and ecology of this area which could ruin the River Avon and the River Till for future generations.

I would again state that I have concerns about the hydrology as I fear parts of my farm will become permanently water logged when the uninterrupted flow of water within Stonehenge Bottom is altered which will inevitably show itself either upstream or downstream of the tunnel.

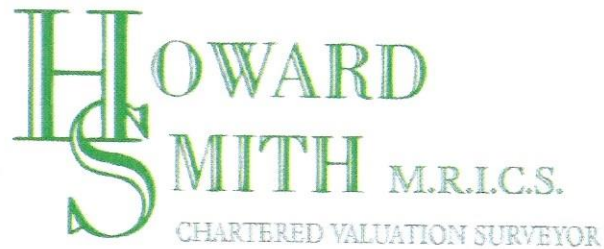
Signed
Howard Smith MRICS Chartered Surveyor
RICS Valuer

Dated



ANNEX B

Supplementary Consultation dated 14th August 2018



**CONSULTATION RESPONSE TO SUPPLEMENTARY CONSULTATION BOOKLET
A303 JULY 2018
ON BEHALF OF
WEST AMESBURY FARMS WEST AMESBURY FARM SALISBURY WILTSHIRE**

I would like to make comment on the Supplementary Consultation for the A303 Stonehenge Amesbury to Berwick Down proposals as indicated in the Public Consultation Booklet dated July 2018.

The Public Consultation process has so far failed to resolve the Issues raised in the consultation response numbered 1,2 &3 which was submitted on behalf of West Amesbury Farms dated 23rd April 2018. This consultation does not address these issues either.

As stated previously it is imperative that West Amesbury Farms have unimpeded access to both the Western and Eastern carriageways of the A303 which may entail providing means of access to the Countess Road . This will involve Highways England having to acquire land currently owned by the National Trust who have claimed but as yet not proven that the land at Countess Farm has inalienable status. There was a route to Countess Road agreed in 2004 which should be investigated as it provides the most direct access. The National Trust have not made their position clear on this even though Philip Sawkill a partner of West Amesbury Farm has an Agricultural Holdings Act tenancy with rights of succession attached. This should therefore be a priority issue for Highways England to resolve.

Issue 3 in the response dated 23rd April 2018 stated there was insufficient detail about what will become of the de trunked road running west from Stonehenge Road to Long Barrow roundabout and those concerns about its maintenance and management still exist as all the consultation document states is that it will become a restricted byway. Clear disclosure on this is required as this is a major issues for the large numbers of farmers who will need to use the de trunked road after the construction of the tunnel.

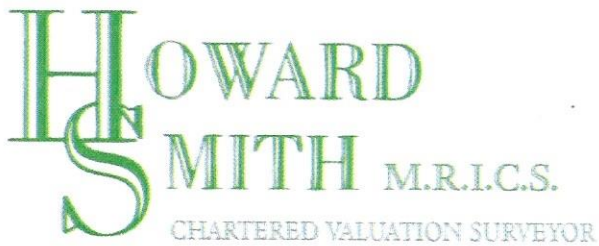
Once again Issue2 from the previous response about the early closure of Stonehenge Road is not addressed in any way . This indicates the failure of Highways England to engage with Wiltshire Council and to then engage with those living adjacent to Stonehenge Road who face the prospect of a totally undesirable dead end being created for which the resources will not be

able to police properly. Stonehenge Road should be closed off at the junction with the Woodford road.

Finally there are no details available as yet to show how power and water will be available to the tunnel . It is assumed that new supplies will be required and it is about time the proposed routes of supply are identified as which may need to cross private land outside the red line boundary.

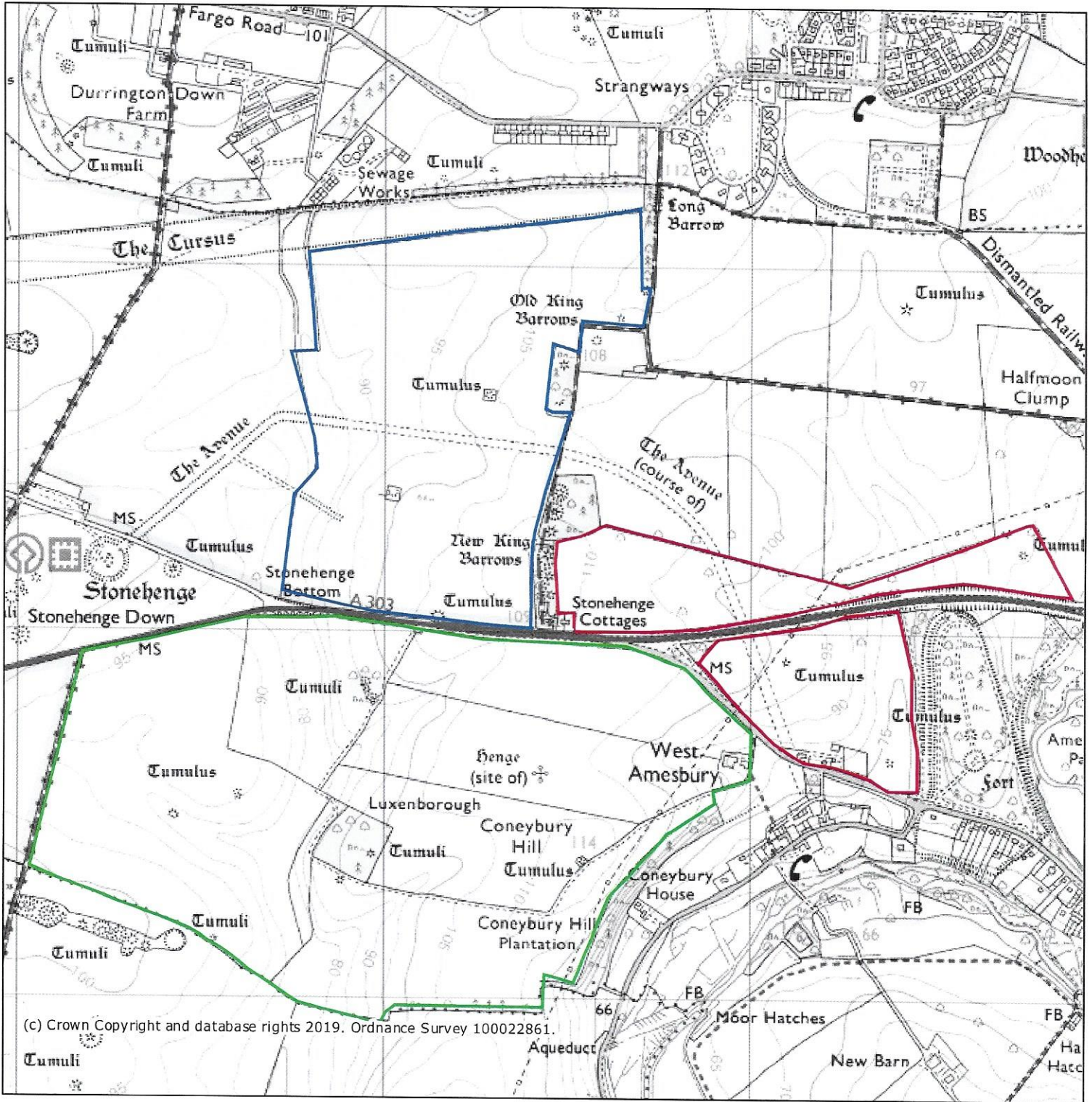
Signed ...Howard Smith.....
Howard Smith MRICS Chartered Surveyor
RICS Valuer

Dated ...14TH AUGUST 2018.....

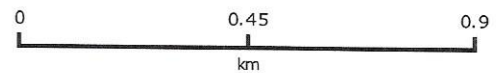


ANNEX C

A plan showing the respective locations of the areas farmed appears at Annex C



(c) Crown Copyright and database rights 2019. Ordnance Survey 100022861.



Projection = OSGB36

xmin = 410400

ymin = 140800

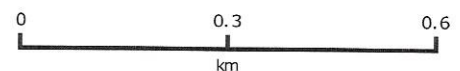
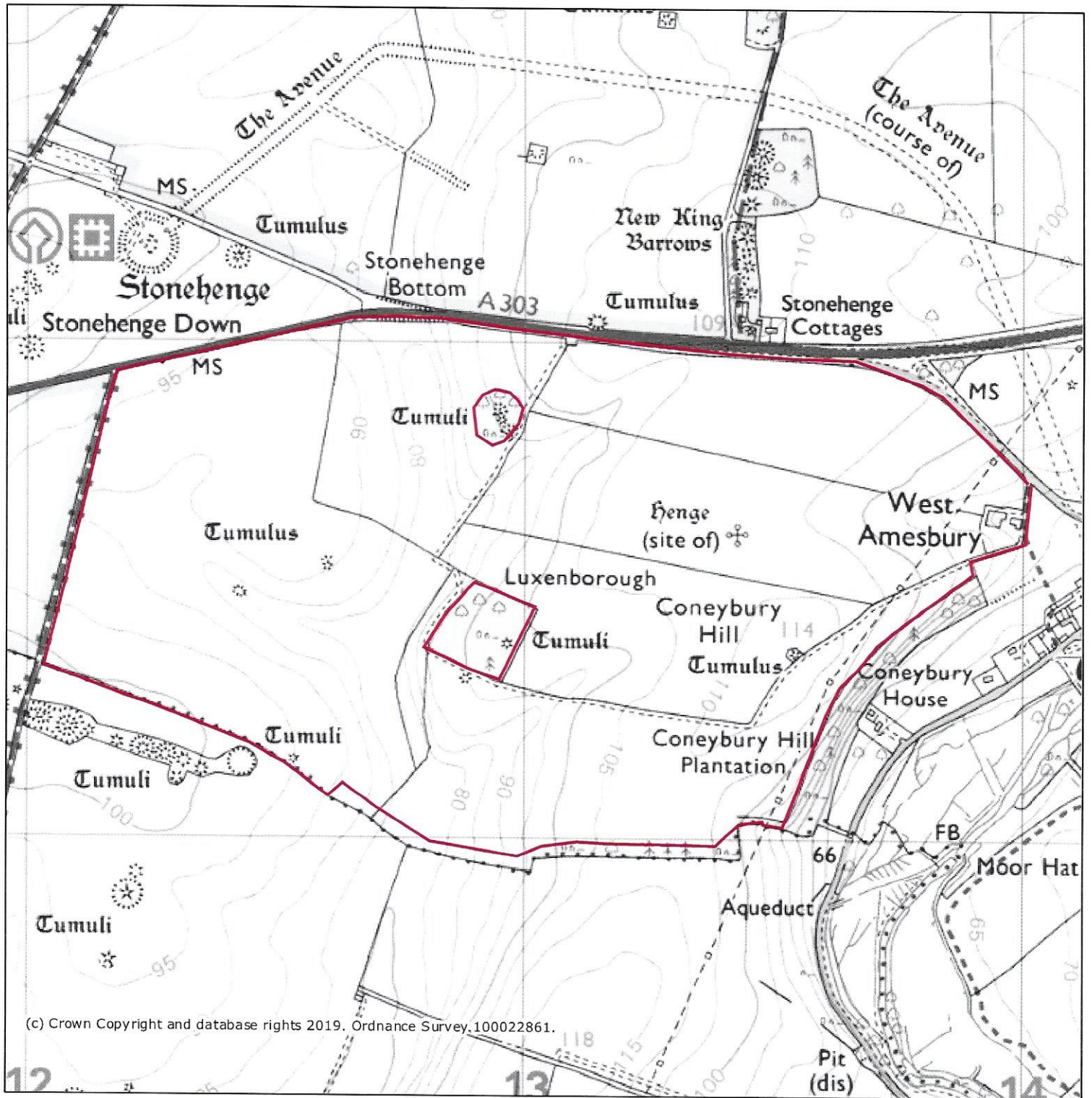
xmax = 416500

ymax = 143600

Map produced by MAGiC on 30 April, 2019.

Copyright resides with the data suppliers and the map must not be reproduced without their permission. Some information in MAGiC is a snapshot of the information that is being maintained or continually updated by the originating organisation. Please refer to the metadata for details as information may be illustrative or representative rather than definitive at this stage.

MAGiC WEST AMESBURY FARM TENANTED



Projection = OSGB36

xmin = 410800

ymin = 140500

xmax = 415300

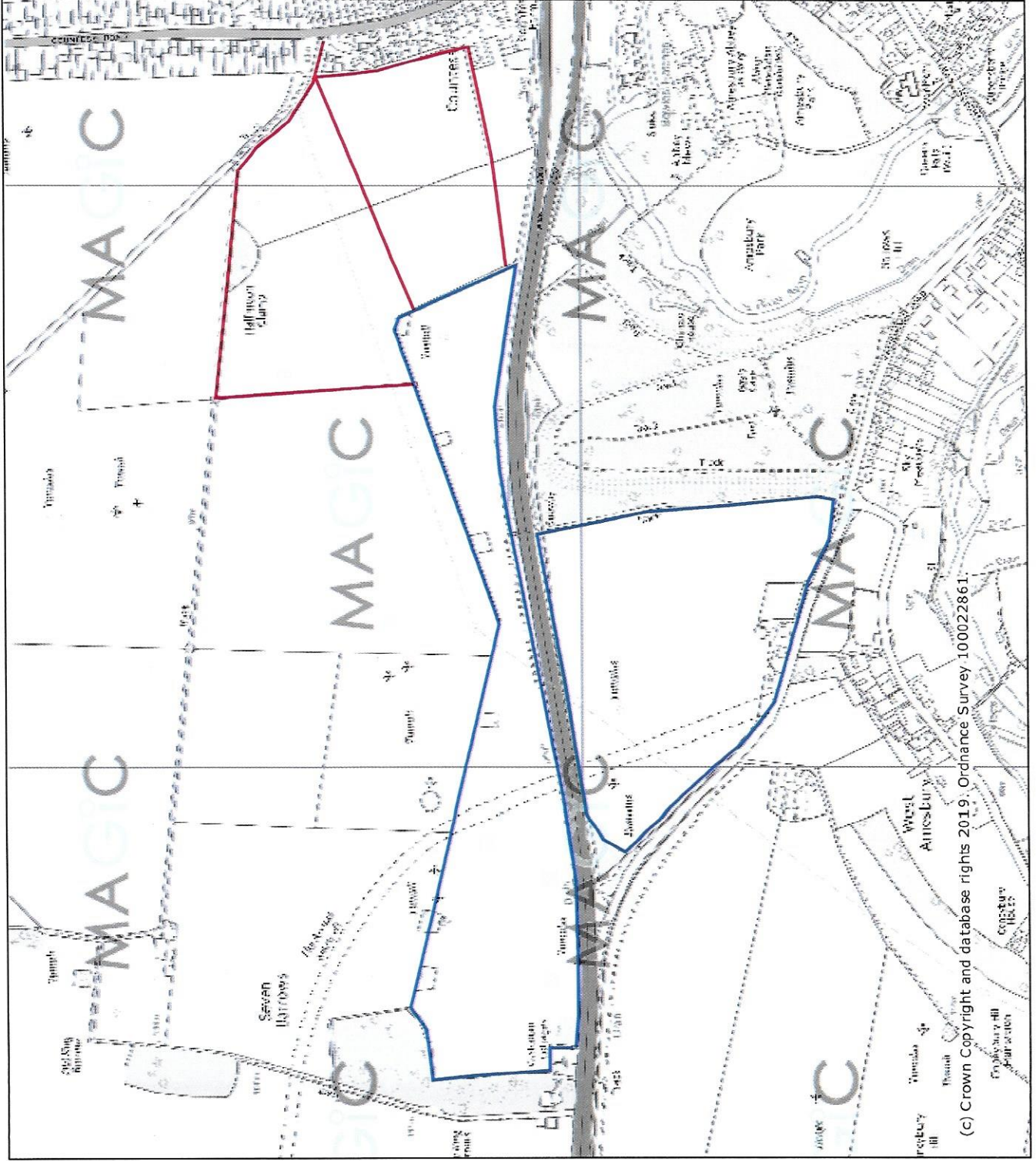
ymax = 142600

Map produced by MAGIC on 30 April, 2019.

Copyright resides with the data suppliers and the map must not be reproduced without their permission. Some information in MAGIC is a snapshot of the information that is being maintained or continually updated by the originating organisation. Please refer to the metadata for details as information may be illustrative or representative rather than definitive at this stage.

ANNEX D

Plan showing Park Farm edged in blue and potential routes of access to Countess Road from Park Farm that will need to be provided by Highways England in red and the surface of this needs to be of road quality

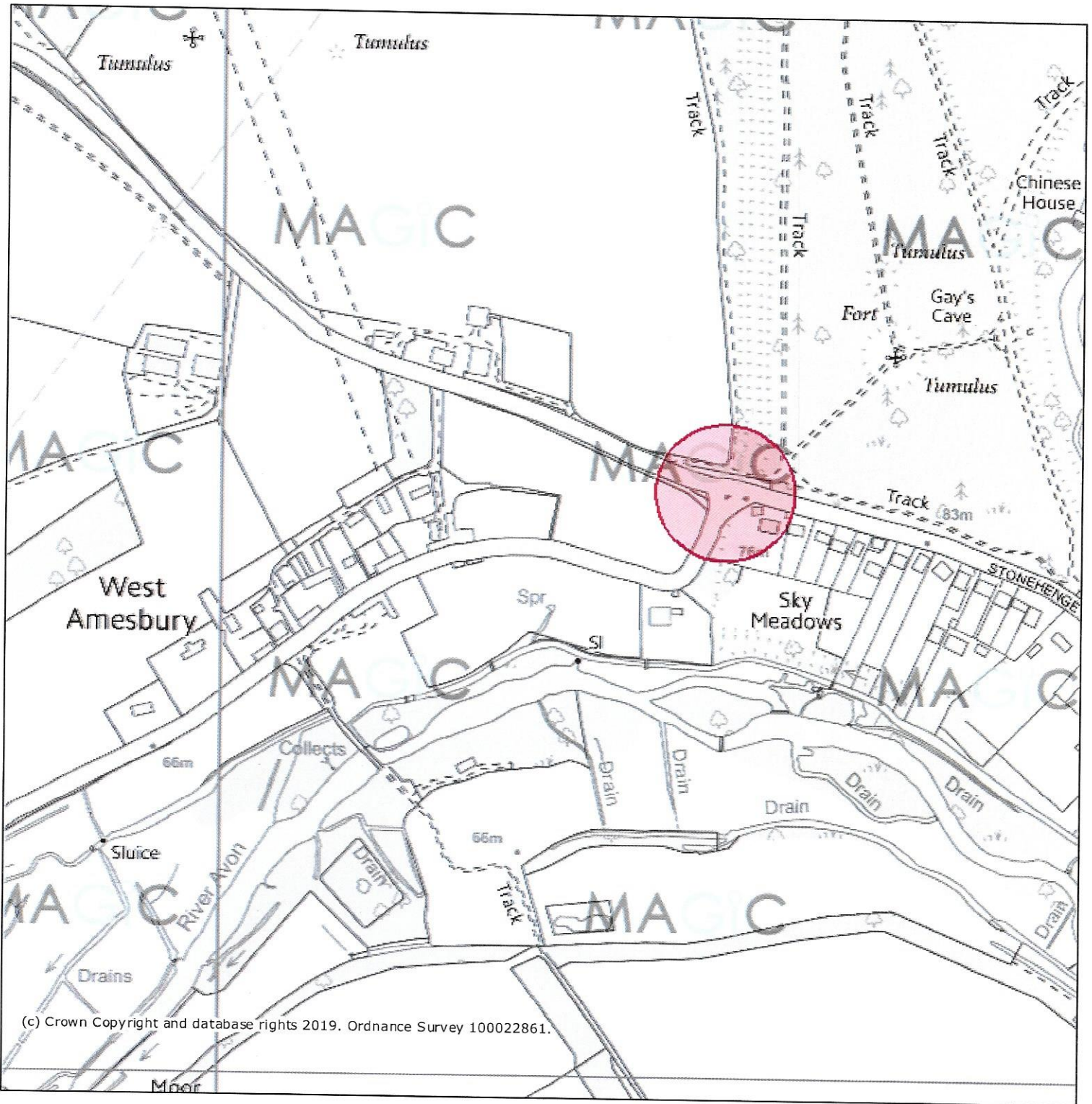


Projection = OSGB36
xmin = 412300
ymin = 141200
xmax = 416300
ymax = 143100

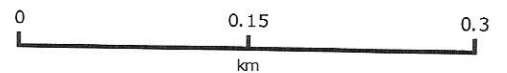
Map produced by MAGiC on 1 May, 2019.
Copyright resides with the data suppliers and the map must not be reproduced without their permission. Some information in MAGiC is a snapshot of the information that is being maintained or continually updated by the originating organisation. Please refer to the metadata for details as information may be illustrative or representative rather than definitive at this stage.

ANNEX E

Plan showing where the point of closure of Stonehenge Road should be at the junction of the Woodford Valley Road with the junction being circled in red



(c) Crown Copyright and database rights 2019. Ordnance Survey 100022861.



Projection = OSGB36

xmin = 413300

ymin = 141000

xmax = 415300

ymax = 142000

Map produced by MAGIC on 1 May, 2019.

Copyright resides with the data suppliers and the map must not be reproduced without their permission.

Some information in MAGIC is a snapshot of the information that is being maintained or continually updated by the originating organisation. Please refer to the metadata for details as information may be illustrative or representative rather than definitive at this stage.