

# A303 Amesbury to Berwick Down

TR010025

## Deadline 2 8.5 Statement of Common Ground – National Trust

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The Infrastructure Planning (Examination Procedure) Rules 2010

May 2019



Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning  
(Examination Procedure) Rules 2010**

A303 Amesbury to Berwick Down  
Development Consent Order 2019

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**STATEMENT OF COMMON GROUND – National Trust**

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**STATEMENT OF COMMON GROUND**

This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) The National Trust for Places of Historic Interest or Natural Beauty.

Signed.....  
[NAME]  
Project Manager  
on behalf of Highways England  
Date: [DATE]

Signed.....  
[NAME]  
[POSITION]  
on behalf of The National Trust for Places  
of Historic Interest or Natural Beauty  
Date: [DATE]

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# 1 Introduction

## 1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (“SoCG”) has been prepared in respect of the proposed A303 Amesbury to Berwick Down improvement project (“the Application”) made by Highways England Company Limited (“Highways England”) to the Secretary of State for Transport (“Secretary of State”) for a Development Consent Order (“the Order”) under section 37 of the Planning Act 2008 (“PA 2008”).
- 1.1.2 The order, if granted would authorise Highways England to carry out the following works:
- A northern bypass of Winterbourne Stoke with a viaduct over the River Till valley;
  - A new junction between the A303 and A360 to the west of and outside the WHS, replacing the existing Longbarrow roundabout;
  - A twin-bore tunnel approximately 2 miles (3.3km) long, past Stonehenge; and
  - A new junction between the A303 and A345 at the existing Countess roundabout.
- 1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available at the deposit locations and/or the Planning Inspectorate website.
- 1.1.4 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

## 1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Highways England as the Applicant and (2) The National Trust for Places of Historic Interest or Natural Beauty
- 1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of the Highways Agency to be conferred upon or assumed by Highways England.

- 1.2.3 As noted in the National Trust’s Relevant Representation ([RR-2344]) at paragraph 1.1, the National Trust is Europe’s largest conservation charity with more than five million members. Established over 125 years ago, its primary purpose is to promote the preservation of special places for the benefit of the nation. To achieve this aim, the National Trust owns and manages places of historic interest and natural beauty; it also has the ability to declare its land to be held inalienably. The National Trust is the largest private landowner in the UK and owns 850 hectares of the Stonehenge landscape within the World Heritage Site. This SoCG deals with issues that are relevant to the National Trust in its capacity as an affected landowner and in its capacity as a major conservation organisation.
- 1.2.4 Collectively Highways England and the National Trust are referred to as ‘the parties’.

### 1.3 Terminology

- 1.3.1 In the tables in the Issues chapter of this SoCG “Not Agreed” indicates a final position and “Under discussion” indicates where these points will be the subject of on-going discussion between the parties with the aim, wherever possible, to resolve, or refine, the extent of disagreement between the parties. “Agreed” indicates where the issue has been resolved.
- 1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to the National Trust, and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to the National Trust.

## 2 Record of Engagement

2.1.1 A summary of the meetings and correspondence that has taken place between Highways England and the National Trust in relation to the Application is outlined in table 2-1.

**Table 2-1 – Record of Engagement**

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
19/01/17	Consultation Response	January 2017 A303 Consultation Response
07/09/17	Preferred Route Announcement – Landowner Meeting	Meeting to discuss the preferred route to be taken forward by Highways England
15/11/17	Survey meeting	Meeting to discuss groundwater pumping surveys
30/11/17	Landowner Meeting	Reviewing the updated design in respect of the National Trusts land holdings. Provide details of any accommodation works for their tenant farmers and land take required on surface and for the tunnel
30/01/18	Landowner Meeting	Update on the consultation materials and plans for the public consultation
31/01/18	Statutory consultation general invite	Landowner Invitational Event
07/02/18	Statutory consultation section 42 notice	Section 42 consultation invite
20/03/18	S42 Notification	S42d extended consultation letter
28/03/18	S42 Notification	S42 Non-Statutory Undertaker
28/03/18	Land requirements meeting	Review plan showing proposed land requirements over National Trust land and discuss process for agreement
24/04/18	Consultation Response	2018 Consultation Response sent by Phillip Morris for The National Trust for Places of Historic Interest or Natural Beauty
11/06/18	Land requirements meeting	Discuss design progress following consultation and review updated plan/strategy details showing proposed land requirements
31/07/18	Land requirements meeting	Discuss outstanding concerns and understand strategy for inalienable land
18/10/18	Land requirements and SoCG meeting	Discuss outstanding concerns and understand strategy for inalienable land
26/10/18	Provision of link to DCO documents and confirmed land requirements	Provision of plan and table showing NT land requirements

03/12/18	S.56 notice	Service of notice under s.56
02/12/28	Meeting with NT and Heritage Monitoring & Advisory Group (HMAG) regarding tunnel restriction	Discuss land and restriction requirements and concerns
11/12/18	Land requirements and SoCG meeting	Discuss outstanding concerns and understand strategy for inalienable land
10/01/19	Provision of SoCG programme and plot details	Response to request for programme and plot areas
11/01/19	Relevant Representation received	NT provided copy of Relevant Representation as provided to the Planning Inspectorate
15/02/19	Land requirements and SoCG meeting	Discuss outstanding concerns and understand strategy for inalienable land
01/03/2019	Land requirements and SoCG meeting	Discuss outstanding concerns and understand strategy for inalienable land

2.1.2 In addition to table 2-1 above, the National Trust has also attended the following stakeholder A303 Amesbury to Berwick Down groups:

- Stakeholder Strategy Board;
- Heritage Monitoring & Advisory Group;
- Scientific Committee;
- UNESCO World Heritage Committee Engagement Group;
- Environmental Group;
- Communications Group;
- Benefits Steering Group; and
- Attendance at regular design progress reviews held by Highways England, to participate in discussion on matters of design with potential to impact on the OUV of the WHS.

2.1.3 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Highways England and (2) The National Trust for Places of Historic Interest or Natural Beauty in relation to the issues addressed in this SoCG.



### 3 Matters Agreed

Ref	Document Reference	Para Ref	Sub-section/ Discipline	National Trust Comment	Highways England Response	Status
3.1	[RR-2344]	2.1	Context	The Trust owns more than 800 ha of the Stonehenge part of the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS), and we take our role as custodians very seriously. Currently, the busy A303 road cuts through the WHS, having a major adverse impact on its Outstanding Universal Value (OUV), and acting as a barrier to people and wildlife seeking to access and explore the landscape. In addition, the Trust is aware of the longstanding challenges of highway access to the South West via the A303 route corridor.	Noted.	Agreed
3.2	[RR-2344]	2.2	Context	The Trust therefore welcomed the announcement of the Government's intention to invest in a bored tunnel to remove a large part of the existing A303 from the Stonehenge landscape. We consider that – if well-designed and delivered with the utmost care for the surrounding archaeology and chalk grassland landscape – it could provide an overall benefit to the WHS. More specifically	Noted.	Agreed

				it could help to reunite the landscape, providing improvements to monument setting, tranquillity and access for both people and wildlife.		
3.3	[RR-2344]	3.1	Areas of interest	In responding to the proposed scheme, the Trust's key areas of interest are cultural heritage, landscape, ecology and public access. This applies to both the potential benefits and any adverse impacts, and to the design, mitigation, construction and the operational phase. In addition, we have an interest in related matters such as appearance, noise and vibration, artificial light, air quality, water quality, public amenity and implications for visitor experience and land management. Finally, we have an interest in the overall planning balance and in the draft DCO, including its Requirements, compliance and monitoring.	Noted	Agreed
3.4	[RR-2344]	6.1 & 7.3	Land - Inalienability of land	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. In order to build the proposed scheme, Highways England would need to compulsorily acquire National Trust	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.	Agreed

				inalienable land. The Trust promises to look after its special places 'for ever, for everyone'.		
3.5	[RR-2344]	7.1	Progress of scheme	The National Trust is a significant landowner at the Stonehenge landscape, and is an advocate of a solution for the A303 that would remove a large part of the existing A303 from the WHS, reuniting the landscape, whilst protecting the integrity of this special place. We welcome the progress made by Highways England to date. At present, based on our initial appraisal of the DCO documents, we have a range of issues and concerns that we intend to raise through the DCO process.	Noted	Agreed
3.6	Meeting 15 <sup>th</sup> February 2019	-	Countess Farm		In a meeting with the National Trust on 15 February 2019, Highways England provided a commitment that Countess Farm would be provided with a pre-construction condition survey.	Agreed
3.7	Meeting 15 <sup>th</sup> February 2019	-	Settlement monitoring		In a meeting with the National Trust on 15 February 2019, Highways England provided a commitment that Stonehenge Cottages would be provided with a condition survey prior to tunnel works.	Agreed

## 4 Matters Under Discussion

Ref	Document Reference	Para Ref	Sub-section/ Discipline	National Trust Comment	Highways England Response	Status
4.1	[RR-2344]	4.1	Current position	<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 (<a href="https://www.icomos.org/world_heritage/HIA_20110201.pdf">https://www.icomos.org/world_heritage/HIA_20110201.pdf</a>). 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 (<a href="https://whc.unesco.org/en/list/373/documents/">https://whc.unesco.org/en/list/373/documents/</a>), and developed in consultation the HMAG. 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</p>	Under Discussion

					<p>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. An agreement is being drafted to detail this engagement.</p>	
4.2	[RR-2344]	5.1.1	DCO - Insufficient detail	<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 detailed 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. An agreement is being drafted to detail this engagement.</p>	Under Discussion
4.3	[RR-2344]	5.1.2	Environment - Document development	<p>The Trust has a strong interest in the development of the key control documents within the DCO including:</p> <ul style="list-style-type: none"> <li>the DAMS (Detailed Archaeological Mitigation Strategy),</li> <li>OWSI (Outline Written Scheme of Investigation),</li> </ul>	<ul style="list-style-type: none"> <li>The Detailed Archaeological Mitigation Strategy (DAMS) is being developed in consultation with Wiltshire Council Archaeology Service and HMAG (which includes the National Trust), and is secured by paragraph 5 of Schedule 2 of the draft Development Consent Order</li> </ul>	Under Discussion

			<ul style="list-style-type: none"> <li>• CEMPs (Construction Environmental Management Plan); and</li> <li>• HEMP (Handover Environmental Management Plan).</li> </ul> <p>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 the completed Archaeological Evaluation Reports that support it, but to date we have not.</p>	<p>(DCO) [APP-020];</p> <ul style="list-style-type: none"> <li>• The Overarching Written Scheme of Investigation is being prepared to accompany the DAMS (as referred to above);</li> <li>• 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</li> <li>• 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).</li> </ul> <p>A full and comprehensive programme of archaeological evaluation surveys has</p>	
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					<p>been completed. The completed archaeological evaluation reports have been developed in consultation with Wiltshire Council Archaeology Service and HMAG, which includes the National Trust. The National Trust has been provided with the opportunity to comment. 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 of the ES [APP-044] and Appendix 6.8 [APP-217]). No additional significant effects have been identified. The National Trust has been consulted on Archaeological Evaluation Reports and has been provided with the opportunity to comment. Those comments will be taken into consideration as the reports are finalised in the near future.</p> <p>Each CEMP, including the HEMP, will be developed in consultation with the relevant stakeholders as set out in the OEMP.</p>	
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					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.	
4.4	[RR-2344]	5.1.3	Rights of Way	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.	The existing road surface of the existing A303 and A360 would be reduced to a width of no more than 4m to provide a level, 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. It would be treated with a new visually recessive surface. The surplus areas of redundant road surface would be replaced by chalk grassland (Section 2.3.56(d) in the Environmental Statement [APP-040]). The design of these elements will be developed through the detailed design process in consultation with National Trust.	Under Discussion
4.5	[RR-2344]	5.1.4	Byways	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.	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 wishes to ensure that the Scheme is integrated	Under Discussion



					<p>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 and 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 public rights of way network, significantly improving connectivity for non-motorised users, as illustrated on the Rights of Way and Access Plans [APP-009].</p>	
4.6	[RR-2344]	5.1.5	DCO - Limits of deviation	<p>The Trust's initial review indicates that some of the proposed Limits of Deviation (LoDs) are a cause for 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>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>	Under Discussion

4.7	[RR-2344]	5.1.6	Land - Restrictions on National Trust land	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.	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 intends 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).	Under Discussion
4.8	[RR-2344]	5.1.7	Environment - Ecology	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	<u>Adequacy of OEMP and Assessment</u> 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	Under Discussion

				<p>proposals should be strengthened, for example mitigation for European Protected Species at the Countess flyover, and the potential for improved east-west ecological connectivity. 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 &amp; Ecology Management Plan) and HEMP.</p>	<p>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 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>As described above, in response to point [RR-2344] 5.1.2, the Outline Environmental Management Plan (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</p>	
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					<p>Plan (LEMP) (reference MW-LAN1), in accordance with industry good practice and a Landscaping Scheme (under paragraph 8 of Schedule 2 of the DCO [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]. During the six hours of survey undertaken at the Countess Roundabout during the targeted Crossing Point Surveys, a total</p>
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					<p>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>	
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					<p><u>East-West Connectivity</u> Improved east-west connectivity could be achieved with the implementation of the replacement planting 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. Highways England welcomes further discussion on this matter.</p>	
4.9	[RR-2344]	5.1.8	Environment - Countess Farm	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><u>Landscape and visual</u> 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]. 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,</p>	Under Discussion

					<p>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 regards 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</p>	
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					<p>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> <p>During construction, a significant adverse daytime noise effect is anticipated for short periods 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 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 (OEMP references MW-NOI1: Best Practicable Means, MW-NOI2: Section 61 Consents, MW-NOI3: Noise and</p>	
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					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.	
4.10	[RR-2344]	5.1.9	Operations - Operational phase	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.	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 Schedule 2 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	Under Discussion

					<p>the National Trust, the details will be developed in consultation with the National Trust.</p> <p>Ground monitoring will be required as part of the tunnel construction works, including possible continued monitoring following completion of construction and into the operational phase. These movement monitoring stations/points are referenced (alongside the archaeological mitigation associated with them) in the DAMS, and types and frequency of activities will be detailed in the CEMP and Heritage Management Plans.</p> <p>Highways England is responsible for ongoing maintenance of the strategic network, in addition to its upgrade and improvement. The local road network is maintained by the local highway authority, being Wiltshire Council.</p> <p>Planned maintenance of the new road and tunnel will be carried out overnight and during periods of low traffic flow in one tunnel bore at a time, with two-way (contraflow) traffic using the other tunnel bore. Arrangements for the ongoing maintenance of the proposed highway drainage system for the scheme, including details of frequency and methods are set out in ES Appendix</p>	
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					11.3, Road Drainage Strategy [APP-281].	
4.11	[RR-2344]	6.1	DCO - Land Take	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 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.	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.	Under Discussion
4.12	[RR-2344]	6.2	Land - Temporary possession	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 controlled within the DCO, potentially through avoidance and appropriate protective provisions	The temporary possession of land will be limited to what is essential for the efficient construction of the Scheme. 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	Under Discussion

					<p>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 over land identified for only subsoil acquisition. Highways England has offered a commitment to the Trust to confirm that no temporary possession powers will 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, 08-22, and temporary possession powers would be limited to subsoil level only.</p>	
4.13	[RR-2344]	7.2	DCO - Communication	<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. An agreement is being drafted to detail this engagement.</p>	Under Discussion
4.14	[RR-2344]	7.3	Land - Land Take	<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</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>	Under Discussion

				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.	
4.15	Environmental Statement	-	Methodology	The methodology for environmental impact assessment including assessment of cumulative effects	Under Discussion
4.16	Environmental Statement	-	Data collection methods	The methods used in the ES for data collection, relevant to the NT's interests are agreed	Under Discussion
4.17	Environmental Statement	-	Baseline data	The baseline data used in the ES for considering environmental effects/impacts are agreed	Under Discussion

## **5 Matters Not Agreed**

5.1.1 There are no matters Not Agreed at the present time.

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