

# A303 Amesbury to Berwick Down

TR010025

Deadline 2 8.10.13 Landscape and Visual (LV.1)

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The Infrastructure Planning (Examination Procedure) Rules 2010

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# Infrastructure Planning

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# **A303 Amesbury to Berwick Down**

**Development Consent Order 2019** 

# Landscape and Visual (LV.1)

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# 13 Landscape and Visual (LV.1)

#### Question LV.1.1

Para 7.3.16(e): Visual Receptors

Why have vehicle occupants not been included as a category?

- 1. Section 7.3.16(e) of the Landscape and Visual Impact Assessment [APP-045] only summarises the Scoping Report (SR) and the SR's identification of the key viewpoints to be identified in the Landscape and Visual Impact Assessment as a 'minimum'.
- 2. Vehicle occupants were not included as a category as they were considered not to be as high a sensitivity as the visual receptors (VR) in section 7.3.16(e). But, vehicles users were included elsewhere in the SR (para 6.3.15(i) and Table 6.10) and in [APP-045] and have therefore been taken into account in the assessment:
  - VR 04C: Motorists on Cherry Lodge Lane;
  - VR 05: Motorists on the B3083;
  - VR 06B: Motorists on the A360;
  - VR 11: Motorists on the A360; and
  - VR 30: Motorists on the A345.



# Para 7.6.4: Landform

It is stated that Parsonage Down NNR is only 80m AOD. Is this correct?

# Response

1. No, this should have stated that Parsonage Down NNR is situated between 90m AOD and 155m AOD, to reflect the information provided on Figure 7.2 [APP-080].



### Para 7.6.121: Prominent ridges and panoramic views

- i. Where is Windmill Hill?
- ii. Has full account been taken of the possibility of significant views from elevated viewpoints both within and outside the study area, such as Beacon Hill and the location of the nearby radio masts?

# Response

#### i. Where is Windmill Hill?

- 1. Windmill Hill is in the northern part of the Stonehenge, Avebury and associated areas World Heritage Site (WHS), approximately 2.3km to the north-west of Amesbury, as illustrated in Map 13 of the Stonehenge and Avebury World Heritage Site Management Plan (2015) Bibliography, Maps, Appendices and Index (WHS Management Plan). Windmill Hill is referenced in paragraph 7.6.121 of the LVIA [APP-045] as the paragraph that summarises the findings of the WHS Management Plan, 2015 in terms of landform and topography.
- ii. Has full account been taken of the possibility of significant views from elevated viewpoints both within and outside the study area, such as Beacon Hill and the location of the nearby radio masts?
  - 2. Yes, the possibility of significant views from elevated viewpoints within and outside the study area has been fully taken into account within the Landscape and Visual Impact Assessment (LVIA) [APP-045], including from Beacon Hill (visual receptor 34) and nearby the radio masts (visual receptor 32).
  - 3. Within the study area and with reference to Figures 7.11 to 7.13 [APP-089, 090 and 91] and the topographical information presented in the visual baseline [APP-226] this covers visual receptors (VR) at:
    - VR 01 east of Yarnbury Castle (c.155 metres (m) Above Ordnance Datum (AOD));
    - VR 02 Byway STAP5 (c.145m AOD);
    - VR 03 Byway BSJA3 (c.115m AOD);
    - VR 04 Parsonage Down National Nature Reserve (115m AOD);
    - VR 04C Cherry Lodge Lane (c.100m AOD);
    - VR 06 Footpath WST04 (c.105m AOD);
    - VR 09 Footpath WST011 (c.110m AOD);
    - VR 10A Hill Farm (c.1155m AOD);
    - VR 10B Restricted byway BSJA9 (c.115m AOD);
    - VR 22 Eastern end of the Cursus (c.110m AOD);
    - VR 24 Coneybury Hill tumulus (c.114m AOD);



- VR 31A Residents adjacent to Lords Walk (95m AOD);
- VR 32 Bridleway AMES6 (c.100m AOD);
- VR 34 Beacon Hill (c.175m AOD); and
- VR 35 Fargo Plantation (c.115m AOD).
- 4. The use of these above locations as representative visual receptors for the visual assessment within [APP-045] were agreed with Wiltshire Council as set out in paragraph 7.3.21 of [APP-045] and agreed in the Statement of Common Ground.
- 5. Outside of the study area, elevated viewpoints within LVIA Appendix 7.3 [APP-223] are:
  - Elevated ridgelines to the north and west of Shrewton (View 1 at c.120m AOD and View 2 at c. 115m AOD);
  - Elevated ridgelines at Durrington (View 3 c.120m AOD);
  - Sides of the Wylye Valley (View 4 c.125m AOD); and
  - Avon Valley (View 5 c.120m AOD).
- 6. Therefore, the LVIA has considered representative elevated viewpoints as part of the assessment of likely visual effects from the Scheme.



#### Para 7.6.137: Oatlands Hill

Why was the viewpoint at Hill Farm Cottages been chosen to illustrate views across to Longbarrow Roundabout from elevated landform at Oatlands Hill?

The summit of Oatlands Hill is higher at 128m AOD, as against 120m AOD at Hill Farm Cottages where VP10 was taken, and it is nearer the new junction.

- 1. The viewpoint at Hill Farm Cottages [illustrated in Figure 7.55 30 [APP-133] (for year 1 and winter) and Figure 7.56 [APP-134] for year 15 and summer] has been chosen as it is representative of residential receptors and the only residential receptors in an elevated position with a view of Longbarrow Roundabout. Also, it was a publicly accessible location to take a photograph from and representative of potential visitors to this location, as well as aiding in the assessment of views from residents at Hill Farm Cottages, which are included as visual receptor 10A on Figure 7.11, [APP-089].
- 2. Whilst the summit of Oatlands Hill is higher, it is not publicly accessible, i.e. there is not a public right of way and therefore it does not constitute a visual receptor location, such that we would not include it as a representative view in the landscape and visual impact assessment [APP-045].
- 3. [APP-045] also includes a view from location 10B on Figure 11 [APP-089] to cover another publicly accessible location in an elevated position to represent views from elevated locations near the summit of Oatlands Hill.



#### Para 7.9.6 et seq: Landscape construction

Has thought been given to the phasing of the earthworks to allow early landscape planting, thus going some way towards mitigating adverse landscape effects during construction?

- 1. At this time, there has been no detailed consideration given to the phasing of the earthworks to allow early landscape planting. A Landscape Scheme (Requirement 8 in Schedule 2 to the Draft DCO [APP-020]) would however require implementation in a phased approach rather than implementation at the very end of the construction programme. A detailed Landscape Scheme would be prepared in accordance with the requirements of the Landscape and Environmental Management Plan (LEMP) [APP 267]. The specific detailed programming of the landscape works would be the responsibility of the appointed contractor.
- 2. The detail of all proposed landscaping would 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.



#### Para 7.9.79: Significant adverse landscape effects remaining at 15 years

This para notes that significant adverse effects would only remain for LLCA 05 – Upper Till Floodplains and Meadows (large adverse) due to the continued presence of the River Till viaduct. However, the permanent presence of the Countess flyover points to a higher adverse rating than given for LLCA 20 – Countess Farm Dry Valleys and LLCA 21 – Avon Valley Slopes. Greater mitigation through attention to detailed design should be considered here.

- 1. In respect of Local Landscape Character Area (LLCA) 05 Upper Till Floodplains and Meadows, the Landscape and Visual Impact Assessment Schedule of Landscape Effects [APP-227] has concluded that the landscape effect would be Large Adverse in both years 1 and year 15 (see Table 7.7 and 7.13). This level of adverse effect is predicted because of the introduction of a large-scale structure into this high sensitive landscape.
- 2. The mitigation measures proposed are designed to integrate the structure into the landscape as much as possible and minimise visual obstruction along the valley floor as set out in para 7.8.5 of [APP-045]. Whilst the design of the structure, at the detailed design stage, would be important, such detail considerations would not materially change the anticipated level of effect reported due to the scale and presence of the structure within the valley as set out in [APP-227]: Schedule of Landscape Effects, pages 12 and 13 for LLCA05.
- 3. The effect for LLCA 20 Countess Farm Dry Valleys is Slight Adverse in year 1 [APP-227, page 19] and Slight Adverse for year 15 [APP-227, pages 19 and 20]. For LLCA 21 Avon Valley Slopes the effect is Slight Adverse in year 1 [APP-227 page 20] and Neutral in year 15 [APP-227, page 20].
- 4. Despite the High (LLCA20) to Medium (LLCA21) level of sensitivity of these character areas, in contrast to LLCA 05, the existing A303 is an existing intrusive feature within these local landscape character areas. Consequently, the degree to which the landscape character is predicted to change (impact) because of the Scheme, would be less than that assessed for LLCA 05.
- 5. Whilst the design of the Countess flyover and tunnel approaches, at the detailed design stage, would be important, such detailed considerations would not materially change the anticipated level of impact reported. This is because, the level of impact is already predicted to be low, due to the presence of the existing road and roundabout junction in which the flyover would be located.



# Para 7.9.79: LLCA 11 – Oatlands Hill and ES Chapter 3: Assessment of Alternatives, Table 3.11/3.12: Longbarrow junction options

The form of the junction is strongly symmetrical. Although generally sunk below existing ground levels and with tree cover, it is of a motorway pattern alien to the local landscape. It could well exercise a strong presence through the arrangement of land form, hedgerows, and other planting, reflecting the large scale symmetry of the junction, dominating the picturesque, rolling landscape and, pointing to a higher adverse rating than given.

Will attempts be made to break up the symmetry through measures such as the regrading of land form around the junction and a less regular arrangement of hedgerows flanking the slip roads?

- 1. The regrading of landform around the junction is proposed to be implemented in the form provided on Sheet 5 of the General Arrangement Drawings [APP-012] to reduce the vertical alignment of both the main line and junction along with a Green Bridge.
- 2. This is in addition to the junction being located away from the World Heritage Site and not being lit, in contrast to the existing Longbarrow Junction, which already demarcates this part of the landscape as a junction with the A303 and A360, at the base of Oatlands Hill.
- 3. The hedgerows flanking the slip roads are considered to be characteristic of the landscape pattern, whereby the existing A303 to the west of the A360 is flanked by hedgerows.
- 4. The final alignment of the junction will be subject to requirement 3 of the Draft DCO [APP-020] Preparation of detailed design, etc. 3--(1) "The authorised development must be designed in detail and carried out so that it is compatible with the works plans, the engineering section drawings (plan and profiles) and the engineering section drawings (cross sections)..."



#### Para 7.9.80 et seq: Visual effects during construction

- i. What mitigation measures would be employed to counter adverse visual effects experienced by footpath users and other receptors?
- ii. During what time period would each receptor be subject to adverse effects? Specify the colour finishes of compound buildings, hoardings, etc.

- i. What mitigation measures would be employed to counter adverse visual effects experienced by footpath users and other receptors?
  - 1. General provisions for site management and working methods are set out in paras 7.8.9, 7.8.10 and Table 7.4 of the Landscape and Visual Impact Assessment [APP-045] and secured by the Outline Environmental Management Plan (OEMP) [APP-187], as per requirement 4 of the draft DCO [APP-020].
- 2. These measures include locating the topsoil and construction compounds at the western end of the Scheme in relatively low lying positions within the landscape; not locating any compounds within the World Heritage Site and locating the compound in the eastern part of the Site to the north-east of Countess Roundabout services, as indicated on Environmental Statement Figure 2.7 A-E Illustrative construction layout including compounds and haul routes [APP-061].
- 3. The OEMP includes protecting retained vegetation (Table 3.2a PWLAN1, page 22), site hoardings around construction compounds (Table 3.2b MWG28, page 37) and clearance and re-instatement of sites on completion measures (Table 3.2b MWG30, page 38).
- 4. These measures within Table 7.4 of [APP-045] and the OEMP are considered to reduce the potential adverse impact of the construction phase by reducing the visibility of the elements of the construction activity by their siting in the landscape, protecting retained vegetation and hoardings, reducing the amount of re-profiling to surface landform by their siting in the landscape and consolidating construction compounds around existing structures in the landscape, so that they are seen in this context.
- 5. However, adverse visual effects would still remain during the construction phase as set out in the Landscape and Visual Impact Assessment [APP-045] paragraph 7.9.6 seq and Table 7.6 for landscape receptors and paragraph 7.9.80 seq and Table 7.8 for visual receptors.



- ii. During what time period would each receptor be subject to adverse effects? Specify the colour finishes of compound buildings, hoardings, etc.
  - 6. The detailed programme is not known at this stage. The assessment is therefore based on the visual receptors being subject to adverse effects for the duration of the construction phase, which for the purposes of the assessment is five years, as set out in Table 2.2 of the Chapter 2: The Proposed Scheme [APP-040].
  - 7. The colour finishes of the compound buildings and hoardings will be for the Contractor to decide, giving consideration to the World Heritage Site context and other environmental constraints, as set out in the Outline Environmental Management Plan (OEMP) [APP-187] section MW-G28 (page 37) and MW-CH3 (page 42).
  - 8. In order to minimise landscape impacts of the compounds, the OEMP states within section MW-G8 that:
    - "all buildings within compounds shall be restricted to one storey in height and rendered / painted in suitable colours to aid in their integration within the landscape; and hoarding shall be installed around the perimeter of the compounds, stained in suitable approved colours, to aid in its integration within the landscape."
  - 9. MW-CH3 (page 42) states in relation to fencing in the WHS and in the WHS setting that:

"The main works contractor shall consult with HMAG to determine the type of construction boundary fencing to be used within the WHS or within the setting of WHS. The type of fencing will be sympathetic to the setting of the WHS. The main works contractor shall prepare an archaeological Method Statement, in consultation with HMAG, for the installation of fencing. Any associated archaeological mitigation requirements in accordance with the Detailed Archaeological Mitigation Strategy shall be set out in a SSWSI."



#### **Photomontages**

Provide the following:

- i. Please make 360-degree CGI visualisations available to the Examination.
- ii. Please convert RVPs 9, 28, and 31 to photomontages.
- iii. Please adapt VP 9 and VP 13 to show the works compounds including the slurry treatment plant (STP) and haul roads.
- iv. Photomontage from the high point (the tumulus) to the south east of VP6, looking south east.
- v. Photomontage looking northwards towards the B3083 from a position south of the proposed A303 bypass, taking in Green Bridge 1 and the B3083 underbridge.
- vi. Photomontage from the summit of Oatlands Hill, looking north-east towards the new Longbarrow junction.
- vii. Photomontage taken from a point to the west of Green Bridge 2, looking eastwards along the carriageway.
- viii. Photomontage taken from the southern roundabout of the new Longbarrow junction, looking north-eastwards.
  - ix. Photomontage taken from the eastern edge of Green Bridge 4, looking eastwards along the cutting towards the western portal.
  - x. Photomontage taken from the western edge of Green Bridge 4, looking westwards along the cutting towards the new Longbarrow junction.
  - xi. Photomontage taken from c.285m east of the junction of Church Street and High Street, Winterbourne Stoke, looking north, taking in the view of the Conservation Area and the River Till viaduct described in Appendix 6.9, Cultural Heritage Settings Assessment 6015, bottom of page 108.
- xii. Photomontage taken from the junction of the tracks to the east of Half Moon Clump, looking southwards.
- xiii. Photomontage from the tumulus by the radio antennae to the north east of Countess roundabout.
- xiv. Photomontage as CH23, but without the mature vegetation.
- xv. Photomontage looking northwards from Blick Mead.
- xvi. Photomontage of the worst-case view in winter, associated with the listed buildings, taken from the northern part of Amesbury Conservation Area towards Countess roundabout.
- xvii. Please provide winter night photomontages illustrating conditions in artificial lighting, including vehicle headlights, in existing, constructional, and operational states of VP 8, RVP 9; photomontages identified in points (iv), (ix), (x), (xiii), and (xv) above; VP30, VP31, CH03, CH04, CH07, CH16, CH19, and CH23. The constructional states should include works compounds and a realistic assessment of haul roads.



# Response

In respect of the above questions:

- I. To make 360-degree visualisations available to the Examination without the need for specialist software, we will make individual 360-degree video files available for each of the photomontage locations within the Landscape and Visual Impact Assessment (APP-045). These video files will be able to be opened directly from the Examination Library links. We will make them available for Deadline 3..
- II. RVPs 9, 28, and 31 can be converted to photomontages and available for Deadline 3.
- III. We do not have the required detailed information to adapt VP 9 and VP 13 to show the works compounds including the slurry treatment plant (STP) and haul roads as rendered images, i.e. with construction and operational detail. We are able to illustrate the STP and work compounds as a wireline image, i.e. the outline of the mass of these features to the limits of deviation. This would be based upon extruding the footprint of the features as indicated on APP-061.
- IV. We can provide a photomontage from the high point (the tumulus) to the south east of VP6, looking south east as it is part of the same public right of way from which VP6 was takenand available for Deadline 3..
- V. We can provide a photomontage looking northwards towards the B3083 from a position south of the proposed A303 bypass, taking in Green Bridge 1 and the B3083 underbridge. This will most likely be the PRoW to the east of Scotland Lodge, and available for Deadline 3.
- VI. The requested photomontage viewpoint from the summit of Oatlands Hill is not a location with public access or any public viewpoint. We are not able to provide a photomontage from the summit of Oatlands Hill, looking north-east towards the new Longbarrow junction without the consent of the landowner. We would refer to Figure 7.55 (APP-133) and Figure 7.56 (APP-134) within the Landscape and Visual Impact Assessment (APP-045) which as explained in response to question LV1.4 provides the representative view of a publicly accessible location and residential receptors in very close proximity to the summit of Oatlands Hill.
- VII. We are not able to provide a photomontage from this location as it is not publicly accessible without the consent of the landowner and does not therefore provide a representative view that will be publicly experienced.
- VIII. We are not able to provide a photomontage taken from the southern roundabout of the new Longbarrow junction, looking north-eastwards as this is not publicly accessible without the consent of the landowner and does not



- therefore provide a representative view that will be publicly experienced. We would refer to image CH22 within the Cultural Heritage Setting Assessment (APP-218) which depicts this location from the north, facing south east.
- IX. We are not able to provide a photomontage as the location is not publicly accessible, without the consent of the landowner and does not therefore provide a representative view that will be publicly experienced presently as part of the assessment against the existing baseline
  - We consider that it should be apparent as to the view from this location, being above the A303 and therefore views will be of vehicles within the retained cutting.
- X. We are not able to provide a photomontage as the location is not publicly accessible without the consent of the landowner and does not therefore provide a representative view that will be publicly experienced presently as part of the assessment against the existing baseline.
  - We consider that it should be apparent as to the view from this location, being above the A303 and therefore views will be of vehicles within the retained cutting.
- XI. In respect of a photomontage taken from c.285m east of the junction of Church Street and High Street, Winterbourne Stoke, looking north, taking in the view of the Conservation Area and the River Till viaduct described in Appendix 6.9, Cultural Heritage Settings Assessment 6015, bottom of page 108, this is likely to be inaccessible and a health and safety risk for the photographer to undertake from the A303. Therefore we are not able to undertake a photomontage.
- XII. We are able to take a photomontage taken from the junction of the tracks to the east of Half Moon Clump, looking southwards as it is publicly accessible. To further assist the Examining Authority on this point we would also refer to photomontage no. 26 within the LVIA (APP-144) and CH18 (APP-218) which are in close proximity to this location. This will be available for Deadline 3.
- XIII. We are able to take a photomontage from the tumulus by the radio antennae to the north east of Countess roundabout and have available for Deadline 3.
- XIV. We understand the request for Photomontage CH23 to be a photomontage of the year 1 scenario. We can undertake this and have available for Deadline 3.
- XV. As Blick Mead is not publicly accessible we are unable to take a photomontage without the consent of the landowner and does not therefore provide a representative view that will be publicly experienced.



- XVI. We can take a photomontage of the worst-case view (year 1) associated with the listed buildings, taken from the northern part of Amesbury Conservation Area towards Countess roundabout. However, this will be taken in late April, so will not be a 'winter' view as vegetation is likely to be in leaf during the examination period.
- XVII. Due to the technical limitations of photomontage, we are not able to provide winter night photomontages illustrating conditions in artificial lighting.

This is because there are several technological limitations that prevent a night time photomontage illustrating a lighting scenario to any degree of technical accuracy or realistic nature. These are:

- The variability of camera exposure at night means that matching the perceived brightness between the lighting for the camera and the existing levels of light in the landscape cannot be done accurately:
- There is a wide variance in car lighting in particular, with complex interactions between the camera, car-lights and environmental conditions which means that the information cannot be technically verified:
- The existing lighting in the photograph is inherent within the image and cannot be modelled; and
- The accurate representation of the existing levels of illumination, which can only be captured by the photograph cannot be processed by rendering software.

In addition to the technical difficulties these variables would be added to the approximation that would be required using the illustrative and indicative design information available at this stage of the planning process.



#### **Photomontages**

Landscape Institute Advice Note 01/11 lists information to be provided on the template. The site and viewpoint location map and distance to site have not been given on the submitted VVMs.

Please comment.

Although not part of Advice Note 01/11, it would also have been helpful if the VVMs had been labelled with the location of proposed features of the Scheme within the view, much as existing features are labelled on the winter version of each RVP.

# Response

Landscape Institute Advice Note 01/11 lists information to be provided on the template. The site and viewpoint location map and distance to site have not been given on the submitted VVMs.

- 1. Figures 7.11 [APP-089] Figure 7.12 [APP-090] and Figure 7.13 [APP-091] were provided as the location mapping for the VVMs along with scale bars for measuring distances.
  - Although not part of Advice Note 01/11, it would also have been helpful if the VVMs had been labelled with the location of proposed features of the Scheme within the view, much as existing features are labelled on the winter version of each RVP.
- 2. To help and assist understanding we will include the labelling of Scheme features on the additional photomontages requested in LV.1.9.



#### **Photomontages**

How were the Limits of Deviation (LoD) taken into account in the preparation of the VVMs?

# Response

1. The full assessment of LoD has been undertaken in the Landscape and Visual Impact Assessment [APP-045], therefore the VVMs were only based upon the Environmental Masterplan drawings [APP-059] and therefore did not take into account the LoD. The Landscape and Visual Impact Assessment [APP-045] does not require the VVMs for assessment purposes and did consider the maximum area of land anticipated as likely to be required, taking into account the proposed limits of deviation (LoD).



# **Photomontages**

- i. Are the VVMs to be viewed at A1 or A3 size?
- ii. Does 'comfortable arm's length refer to A1 or A3 versions?

- i. Are the VVMs to be viewed at A1 or A3 size?
- 1. The Landscape and Visual Impact Assessment VVMs are to be viewed at A1 as per their drawing title blocks.
- ii. Does 'comfortable arm's length refer to A1 or A3 versions?
  - 2. It refers to the A1 versions.



#### Landform shown in the Environmental Masterplan

- i. Please confirm the gradients to be achieved in the earthworks integrated into the existing landform and those of land to be returned to agricultural use.
- ii. Could these gradients, and other mitigation, be achieved within the Order limits were the maximum LoDs adopted?

- i. Please confirm the gradients to be achieved in the earthworks integrated into the existing landform and those of land to be returned to agricultural use.
  - 1. One of the key measures, designed to assist with the Scheme's integration into the landscape, is the proposed grading out of the engineering embankments and screen bunds/false cuttings into the landscape and returning the regraded land back into agricultural use. The locations and extent of these proposals are shown on the Environmental Masterplan [APP-059]. In each case, the design has sought to reflect the existing landform, which has meant recreating existing gradients, over as much of the regraded land as practicable. These measures would not only ensure that the design responds to the existing landform but would also enable the continuation of the same agricultural land use following completion of the works. The proposed 2 metre (m) contours, within each of the areas to be regraded, are shown on the Environmental Masterplan.
- 2. From east to west, the proposed gradients are as follows;
  - Chainage 3000-3500 south land to be retained within the highway and planted with woodland, at gradients between 1:8-1:10
  - Chainage 3100-3500 north land to be sown with chalk grassland and scrub

     at gradients between 1:10-1:15;
  - Chainage 3300-3500 south Return of regraded land to a paddock, at gradients between 1:10 1:20;
  - Chainage 3550-3950 south Return to agriculture, at gradients of 1:10;
  - Chainage 4200-5100 south Return to agriculture, at gradients between 1:10-1:15;
  - Chainage 4400-4800 north Return to agriculture, at gradients between 1:5-1:8 east of PRoW WST068 and 1:10-1:15 west of PRoW WST068; and
  - South of A360 slip Road, south of Scheme 1:10-1:20 but gentler in places.
- ii. Could these gradients, and other mitigation, be achieved within the Order limits were the maximum LoDs adopted?
  - 3. The limits of Deviation (LoD) for the Scheme are shown in Table 2.1 of Chapter 2 of the Environmental Statement (APP 040). The potential implications on the effectiveness of the mitigation discussed in i) above, if the LoD were to be



adopted would be as follows. It should be noted that none of the scenarios described would impact on the desired mitigation outcomes:

- a. Vertical and downward deviation of up to 1m, centreline deviation up to 3m, resulting in a slight steepening of proposed gradients, if the vertical alignment were to move upwards by 1m and or move south by up to 3m. A corresponding slackening of gradients if the vertical alignment were to be lowered by up to 1m and or move north by up to 3m.
- b. Vertical and downward deviation of up to 1m, centreline deviation up to 3m, resulting in a slight steepening of proposed gradients, if the vertical alignment were to move upwards by 1m and or move north by up to 3m. A corresponding slackening of gradients if the vertical alignment were to be lowered by up to 1m and or move south by up to 3m.
- c. Vertical and downward deviation of up to 1m, centreline deviation up to 3m, potentially resulting in a slight steepening of proposed gradients, if the vertical alignment were to move upwards by 1m and or move south by up to 3m. Although it is likely that any gradient changes could be accommodated within the regraded land to be woodland planted and retained within the highway. A corresponding slackening of gradients if the vertical alignment were to be lowered by up to 1m and or move north by up to 3m.
- d. Vertical and downward deviation of up to 1m, centreline deviation up to 3m, resulting in a slight steepening of proposed gradients, if the vertical alignment were to move upwards by 1m and or move south by up to 3m. A corresponding slackening of gradients if the vertical alignment were to be lowered by up to 1m and or move north by up to 3m.
- e. Upward vertical deviation of up to 0.5m, downward vertical deviation of 1m, centreline deviation up to 3m, resulting in a slight steepening of proposed gradients, if the vertical alignment were to move upwards by 0.5m and or move south by up to 3m. A corresponding slackening of gradients, if the vertical alignment were to be lowered by up to 1m and or move north by up to 3m.
- f. Upward vertical deviation of up to 0.5m, downward vertical deviation of 1m, centreline deviation up to 3m, resulting in a slight steepening of proposed gradients, if the vertical alignment were to move upwards by 0.5m and or move north by up to 3m. It is however likely that the steepening of the gradients east of PRoW WST068, could be achieved within the retained highway land, such that the gradients of land returned to agriculture would not change. There would be a corresponding slackening of the gradients, if the vertical alignment were to be lowered by up to 1m and or move south by up to 3m.
- g. Realigned A360 Upward vertical deviation of 0.5m, downward vertical deviation of up to 1m, centreline deviation of up to 3m, resulting in a slight slackening of the proposed gradients, if the vertical alignment were to



move upwards by 0.5m and or further to the north by up to 3m. A corresponding slight increase in the proposed gradient if the vertical alignment were to be lowered by up to 1m and or the horizontal alignment moved to the south by up to 3m.

4. In conclusion, the proposed gradients of the regraded earthworks which are to be returned to agricultural use, have been designed to reflect existing gradients as far as practicable. Even if the LoD were to be applied to their fullest extent, resulting in a slight steepening of the proposed regrading, there would be no material adverse impact on the effectiveness of these measures for either landscape integration or visual screening purposes. Similarly, there would be no restriction on agricultural land use, as gradients would remain suitable for ongoing farming practice.



### Paras 7.4.3/4: Screening

What action would be taken if the planting failed to provide the height of screening assumed in the assessment of visual effects?

- 1. If the Contractor's planting failed to achieve these heights, then it would not meet the Contract objectives, which are based upon delivering the requirements of the Environmental Statement and conformance with Requirement 8 of the draft DCO (APP020) which states: "The landscaping scheme must be based on the mitigation measures included in the environmental statement."
- 2. If planting failed, Requirement 8 states that the landscaping scheme must: "measures for the replacement, in the first available planting season, of any tree or shrub planted as part of the landscaping scheme that, within a period of 5 years after planting, dies or becomes seriously diseased."
- 3. The Contractor would therefore most likely have to implement larger species at these heights, before their works could be considered complete by Highways England.
- 4. However, the risk of planting failure has been substantially reduced, as the requirements to achieve the successful establishment and growth of new planting to meet the Environmental Statement are set out in the Outline Landscape and Ecology Management Plan (OLEMP) [APP-267].
- 5. The OLMEP covers the implementation and management of the range of habitats which are indicated on the Environmental Masterplan [APP-059]. The OLEMP would be developed by the Contractor to form a Landscape and Ecology Management Plan (LEMP) as stated in MW-LAN1 (page 45) of the Outline Construction Management Plan [APP-187].
- 6. Sections 8 and 10 of the OLEMP specifically sets out requirements for the planting of trees, scrub and hedgerows, which are the habitats linked to the screening assumed in the visual effects. The OLEMP includes the requirements of ground preparation, indicative species and aftercare management regimes, so as to achieve the assumed heights.
- 7. As the OLEMP provides for planting which can achieve screening and the measures for its long-term management, to cover the 15 year timeframe of the assessment of visual effects, the Contractor's LEMP would meet the Contract objectives.



Would the viaduct over the River Till and associated roadway be lit at night?

# Response

1. No, there are no proposals to light the River Till viaduct or its approaches at night. This is provided for at D-CH11 of the Outline Environmental Management Plan [APP-187] and via Requirement 4 of the draft DCO [APP-020], which requires works to be undertaken in accordance with the OEMP.



#### **European Landscape Convention**

Please provide more detail to support your view that the scheme would be contrary to the aims of the European Landscape Convention.

- 1. Although this question is not directed to the Applicant, we can advise that the Applicant considers that the Scheme would not be contrary to the aims of the European Landscape Convention (ELC).
- 2. ELC Article 3 sets out the aims of the ELC as:
  - "...to promote landscape protection, management and planning and to organise European co-operation on landscape issues."
- 3. Referring to ELC Article 1 Definitions, landscape protection is defined as:
  - "actions to conserve and maintain the significant or characteristic features of the landscape, justified by its heritage value derived from its natural configuration and/or from human activity."
- 4. Paragraph 7.6.118 of [APP-045] summarises the Stonehenge and Avebury World Heritage Site Management Plan (WHS Management Plan), 2015 and that the rolling landform, with large fields bounded by fences and long-distance views of plantations, clumps of trees, roads and upstanding archaeological features are noted by the WHS Management Plan as the most distinctive characteristics of the downland plateau landscape of the WHS.
- 5. The Scheme has conserved and maintained these features by the design principles set out in section 7.8 of the Landscape and Visual Impact Assessment [APP-045], the engineering plans [APP-010] and as indicated on the Environmental Masterplan [APP-187].
- 6. In summary these measures include:
  - Integration of earthworks into the rolling landform;
  - Returning land to permissive agriculture;
  - Minimising land take within the WHS;
  - Physically and visually reuniting the landscape of the WHS through the removal of traffic and improving landscape tranquillity by removing surface traffic through a significant portion of the WHS;
  - Removing vehicles from part of the WHS via the bored tunnel; and
  - Removing lighting at Longbarrow Roundabout and upgrading lighting at Countess Roundabout.



- 7. ELC Article 1 defines Landscape management as:
  - "action, from a perspective of sustainable development, to ensure the regular upkeep of a landscape, so as to guide and harmonise changes which are brought about by social, economic and environmental processes."
- 8. The regular upkeep of the landscape is set out in MW-LAN1, page 45 of the Outline Environmental Management Plan (OEMP) [APP-187] via the requirement for a scheme-wide Landscape and Ecology Management Plan (LEMP) and MW-LAN4 which requires Landscape Maintenance. The measures within the OEMP are required to be followed and delivered under Requirement 4 of the draft DCO [APP-020]
- 9. The LEMP would draw from the management outlined in the draft LEMP [APP-267] to achieve the successful establishment of the landscape scheme by year 15, to reflect the objectives of the Environmental Statement.
- 10. ELC Article 1 defines Landscape planning as:
  - "strong forward-looking action to enhance, restore or create landscapes."
- 11. The Scheme would enhance, restore and create landscapes as set out in section 7.8 of the Landscape and Visual Impact Assessment [APP-045], the engineering plans [APP-010] and as indicated on the Environmental Masterplan [APP-187]. These measures include:
  - Creation of calcareous chalk grassland, which is a nationally rare habitat;
  - Enhancing recreational access by maximising non-motorised user opportunities via Green Bridges and the re-use of the existing A303; and
  - Restoring the landscape pattern and connectivity within the WHS via the existing A303 being in a bored tunnel.
- 12. Therefore, the Scheme would not be contrary to any element of the aims of the European Landscape Convention.



#### Para 7.6.88: Future baseline

Is the Council content with the list of committed or planned developments taken into account in assessing the future baseline?

# Response

1. [Noting that this question is to Wiltshire Council] As stated within paragraphs 15.2.12-15.2.14 of Chapter 15 of the ES, Assessment of Cumulative Effects [APP-053], Wiltshire Council was consulted during preparation of the list of committed or planned developments and responded on 14 February 2018 following a review of the draft list. To keep the list up to date Wiltshire Council was consulted further and responded again on 16 August 2018 to confirm additional developments for consideration within the assessments. These agreed and confirmed developments have all been considered and taken into account as part of the assessment process and reported in the ES.



### Methodology

- i. Explain how the analysis combines the guidance in GLIVIA 3 and IAN 135/10 and moves from one to the other.
- ii. Also, explain the connection between Table 7.2.11: IAN 135/10 Significance of landscape and visual effect categories, and Table: IAN 135/10 Landscape and visual typical effect descriptions. The first table seems to have been arrived at through a step by step process of professional judgment which is then ditched at the second table, where a separate professional judgment process is embarked upon.

- i. Explain how the analysis combines the guidance in GLIVIA 3 and IAN 135/10 and moves from one to the other.
  - 1. The combination of the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA 3) and Interim Advice Note 135/10 (IAN 135/10) and how the assessment moves between them is set out in section 7.3 of the Landscape and Visual Impact Assessment [APP-045].
- 2. In summary, the analysis uses GLVIA 3 to establish the landscape and visual baseline and associated receptors, e.g. landscape character areas or representative visual receptors and their sensitivity to the Scheme through an assessment of value and susceptibility.
- 3. Having established the landscape and visual baseline, the analysis then moves to IAN 135/10 for the assessment of the magnitude of impact (change) resulting from the Scheme. The IAN 135/10 definitions of impact are specific to highways schemes.
- 4. The relationship between the sensitivity of the receptors and the magnitude of impact is then used to establish the significance of effect of the Scheme. The guide to this relationship is derived from IAN 135/10.
- ii. Also, explain the connection between Table 7.2.11: IAN 135/10 Significance of landscape and visual effect categories, and Table: IAN 135/10 Landscape and visual typical effect descriptions. The first table seems to have been arrived at through a step by step process of professional judgment which is then ditched at the second table, where a separate professional judgment process is embarked upon.
  - 5. Table 7.2.11: IAN 135/10 is the guide to link the sensitivity of a receptor with the magnitude of impact and determine a likely significance of effect. As a guide it provides options for the significance of effect. For example, a medium sensitivity with a major magnitude may result in a moderate or large effect.
  - 6. By looking at Table IAN 135/10 Landscape and visual typical effect descriptions (Table 7.2.12) the stated definitions for a moderate or large effect can be considered to determine which is the appropriate assessment.



7. The assessment process has considered the two tables together at all stages.



#### **Limits of Deviation**

How were the LoDs taken into account in assessing the extent of visibility, the landform gradients, and the loss of existing trees?

- 1. The Landscape and Visual Impact Assessment (LVIA) [APP-045] is based on the works proposed in the DCO application (described principally in Schedule 1 of the draft DCO [APP-020] the works plans [APP-008] and the engineering sections [APP-010]) and the maximum area of land anticipated as likely to be required, taking into account the full extent of the proposed limits of deviation (LoD) for the Scheme (summarised in Table 2.1 of [APP-040]) and the flexibility of detailed design provided for in the DCO.
- 2. The Extent of Visibility The visual assessment took account of the worst-case scenario, whereby the Scheme was assessed at the maximum upwards and lateral heights of deviation, rather than the downwards LoD. This was because by being 'higher' in the landscape, or closer to a visual receptor, the Scheme would likely be more visible than if positioned 'lower' in the landscape. For the tunnel section within the World Heritage Site, the LVIA assessed the minimum length of canopy at the western and eastern ends of the bored tunnel. This was considered appropriate as it would be the worst-case scenario, whereby more of the retained cutting and vehicles beyond the tunnel would be theoretically visible.
- 3. The landform gradients The landform gradients were similarly assessed in relation to the maximum upwards LoD heights, meaning a slight steeping in proposed gradients.
- 4. Loss of Existing Trees The LoD are taken into account within the Arboricultural Implications Assessment (AIA) [APP-230] as the assessment includes the trees on or immediately adjacent to the Scheme boundary to a buffer of 5 metres, as set out in paragraph 8.2.1 of [APP-230].
- 5. From the above, the LVIA therefore takes into consideration what can be regarded as a realistic 'worst case' assessment of the impacts associated with the Scheme.



### **Green Bridges**

What assumptions have been made in the LVIA as to the locations and heights of the green bridges?

# Response

1. The locations and heights of the Green Bridges have been taken from the Engineering Section Drawings [APP-010] and [APP-011]) and the indicative Environmental Masterplan [APP-059] in combination with the Bored Tunnel Limits of Deviation Plan (LoD) [APP-019] and the LoD set out in Table 2.1 of Chapter 2 [APP-040]. The Landscape and Visual Impact Assessment (LVIA) [APP-045] has therefore assessed the Scheme as a 'worst case' scenario by assessing the maximum area of land required for the Scheme.



#### Para 7.3.9: The parts of the construction activity likely to be most visible

These are considered by the ES to be the construction compounds and the STP. However, construction haul activity is also likely to be very visible, comprising the use of haul roads exposing white chalk, and frequent large moving vehicles, possibly accompanied by dust disturbance.

Please comment.

- 1. We agree that the haul activity will be visible and this has been assessed within the Landscape and Visual Impact Assessment (LVIA) [APP-045] for the construction phase (paragraph 7.7.2(c)), but this will only be locally within the study area and seen in the context of vehicles on the existing A303 and other construction activity. The LVIA [APP-045] recognises that haul activity will be particularly visible from recreational routes that cross the River Till valley and properties in the northern part of Winterbourne Stoke, as set out in [APP-045] paragraphs 7.9.83 to 7.9.85. The haul roads are also considered for visual receptors (VR) in more detail in the visual assessment tables [APP-228] for:
  - VR 02: Recreational users of Parsonage Down National Nature Reserve, Appendix 7.8 Schedule of Visual Effects [APP-228] page 2;
  - VR 06: Recreational users of PRoW (footpath) WSTO4 across High Down, Appendix 7.8 Schedule of Visual Effects [APP-228] page 5
  - VR 07: Recreational users of Byway WSTO4 as it crosses the River Till, Appendix 7.8 Schedule of Visual Effects [APP-228] page 5;
  - VR 07B: Recreational users of Byway WST 04, Appendix 7.8 Schedule of Visual Effects [APP-228] page 5;
  - VR 08: Residents (nos. 1-4) on the eastern side of Winterbourne Stoke and to the south of the existing River Till crossing, Appendix 7.8 Schedule of Visual Effects [APP-228]page 7; and
  - VR 12: Tourists and Visitors at the Stonehenge Visitor Centre, Appendix 7.8 Schedule of Visual Effects [APP-228] page 11.
- An illustration of likely haul roads required during the construction phase of the Scheme is provided within the Environmental Statement (ES), Figure 2.7 [APP-061].
- 3. The approach to haul roads and to mitigate their impacts is set out in 'Approach to Haul Roads and Archaeological Protection' (April 2019) [REP1-005], submitted at Deadline 1, which includes haul roads located along the alignment of the Scheme and built under a 'no-dig' solution to retain topsoil in situ.
- 4. Construction traffic outside of the Scheme boundary would utilise the public highway and would be controlled by measures identified within the Contractor's



- Traffic Management Plan, developed pursuant to requirement 9 of Schedule 2 of the draft DCO [APP-020].
- 5. Dust management measures are set out in each discipline section of the Outline Environmental Management Plan [APP-187].
- 6. The impacts of dust are assessed within Chapter 5: Air Quality [APP-043, para 5.3.11 to 5.3.15]. The mitigation for construction dust is set out in Chapter 5 Air Quality of the Environmental Statement [APP- 043], Section 5.8 and Appendix 5.4 and includes obligations to:
  - develop and implement a series of dust management measures and monitoring measures (e.g. periodic visual inspections within and along site boundaries);
  - fully enclose specific operations where there is a high risk of dust production and the site is active for an extensive period;
  - all construction plant would use fuel equivalent to ultra-low sulphur diesel (ULSD) where possible;
  - ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport; and
  - implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site) where reasonably practicable.
- 7. Dust mitigation measures based on standard best practice has been included in the Outline Environmental Management Plan (OEMP) in MW-AIR1 [APP-187] to manage dust effects.
- 8. The provisions of the OEMP are secured within Requirement 4 of the draft DCO [APP-020] which requires works to be undertaken in accordance with the OEMP.



### Para 7.3.45: Verification of the ZTVs through fieldwork

Tells us that the fieldwork concluded that many of the locations would not experience a significant effect because of distance, intervening landform, buildings and vegetation. However, features such as the STP or projecting road signs may well attract attention from very large distances within a wide panorama, as does a distant church steeple. Although photographs generally flatten and suppress this effect, it can be seen in Montage VP 08 where the road furniture appears prominent above the horizon, albeit at year 15 it appears shielded in summer by foliage.

Please comment

- 1. Certainly, the height of the STP would be visible from across parts of the study area assessed in the landscape and visual impact assessment (LVIA) [APP-045]. But in longer distance views from beyond the LVIA study area, to which paragraph 7.3.45 [APP-223] is referring, the assessment [APP-223, paragraph 7.3.39] concluded that the Scheme would be barely noticeable.
- 2. In relation to the question and the suggestion of the 'church steeple', reviewing the information in [APP-045], the upper part of the STP is considered not to attract an 'attention' like a church steeple as it would be seen in the context of Hill Farm cottages, so it would remain below the skyline. The main focus of the view is Shrewton, which attracts the viewers' attention.
- 3. The design intent of the Scheme has been to minimise the visibility of new infrastructure, particularly within the World Heritage Site (WHS). As per the indicative design on the General Arrangement Drawings [APP-012] where variable message signs are not within the WHS.
- 4. Paragraph 7.3.45 does not relate to Montage VP08, because VP08 was within the LVIA study area and is clearly visible until the proposed planting establishes to screen it, to reflect the year 15 assessment scenario. The impact of views of this road signage, which would attract attention is outlined in LVIA paragraph 7.9.99 and 7.9.100 and in more detail for the specific receptors in the visual effect tables [APP-228]. Views of this road signage were a contributing factor to the assessment of significant adverse effects for visual receptors at year 1 of operation.
- 5. The context of paragraph 7.3.45 is about the determination of a study area for the LVIA assessment of likely significant effects and the LVIA study area was agreed with Wiltshire Council, as set out in the Statement of Common Ground with Wiltshire Council, Table 3.19, doc ref: LV2, page 99.



#### **ZTV** construction phase

Please confirm that the ZTV for the construction phase shown at Appendix 7.3 has been modelled on the assumption that the main construction compound and the Countess compound would be 10m AGL rather than being single storey buildings as stated at para 7.4.2 of Chapter 7?

- 1. Yes, the Zone of Theoretical Visibility (ZTV) in Appendix 7.3 [APP-223] was modelled at 10 metres above ground level. This is set out in [APP-223] paragraphs 7.3.15 and 7.3.20 and figures 7A.2 and 7A.3.
- 2. The modelling described in Appendix 7.3 was used to establish the parameters for the landscape and visual study area at the early stages of the design and assessment phases. By the time of undertaking the full assessment, it had been decided that the buildings within the compounds would be single storey, hence the statement in paragraph 7.4.2. This single storey height was within the parameters of the Appendix 7.3 modelling and therefore the ZTV modelling represents a worst case and very precautionary scenario.



### Sensitivity ratings for LLCAs

Some of the sensitivity ratings appear doubtful. For instance, LLCA 11: Oatlands Hill, where susceptibility is reduced from high to medium resulting in medium sensitivity because the area is already crossed by the A303 and the A360. Since the base sensitivity without the existing roads is high, arguably this should be the starting point for assessment of the effect of the changes proposed otherwise the opportunity to minimally harm or even enhance the landscape could be lost.

- 1. The sensitivity rating for LLCA 11: Oatlands Hill is considered appropriate as reasoned and explained below.
- 2. The judgement on sensitivity is about the consideration of the existing situation, and that includes the A303 and the A360. The judgement on sensitivity is not based upon a 'base' sensitivity, i.e. a landscape without any 'human' influence from roads, buildings and land management, because these are an intrinsic part of the landscape as used, seen and experienced.
- 3. This approach is in line with the Guidelines for Landscape and Visual Impact Assessment (GLVIA 3), (which is referenced in footnote 102 of the National Policy Statement for National Networks) which sets out in paragraph 5.4 that elements which make up the baseline include:
  - "the influence of human activity, including land use and management, the character of settlements and buildings, and pattern and type of fields and enclosure."
- 4. Opportunities to minimise harm and enhance the landscape are not lost, as the Scheme is assessed against the change from the existing situation.



### Sensitivity rating for LLCA02: Parsonage Down dry Valley

Why is this LLCA given a medium sensitivity rating whilst the other LLCAs within the chalk down land are in the main assessed as being of high sensitivity?

- 1. LLCA02: Parsonage Down dry valley (LLCA02) is assessed in [APP-225, page 3] under the heading: LLCA 02: Parsonage Down Dry Valley as not to be of high sensitivity because of the influence of vehicles on the B3083 and A303 to its character and tranquillity and that its recreational access is limited to a permissive path only. This is in contrast to other parts of the downland landscape where there are Public Rights of Way, more extensive ecological or cultural association and a higher landscape value, resulting in a higher sensitivity.
- 2. In terms of the susceptibility of LLCA02, its enclosure from the wider landscape and simple pattern where considered to be more able to accommodate the Scheme, in contrast to other parts of the downland landscape which are more open in relation to the wider landscape and therefore with a higher susceptibility.
- 3. The combination of the low value and medium susceptibility for LLCA 02, as fully set out in [APP-225, page 3] in paragraphs: 7.5.4 to 7.5.6, results in a medium sensitivity to the Scheme.



#### Assessment of LTCAs

Many of the LTCAs are characterised by high value and susceptibility historic cores or conservation areas, and low value and susceptibility adjacent areas. In combination, the overall ratings are down-graded. Perhaps these component areas should be assessed separately.

- 1. We consider it appropriate for the extent of the LTCAs to have covered the entire settlement patterns and assess the sensitivity based upon the balance between the value and susceptibility of the relevant landscape and visual matters. Whilst the component areas could have been assessed separately, we consider that this would not be proportionate to the landscape and visual assessment of the Scheme, where the focus is more towards the rural landscape.
- 2. The overall ratings have not been downgraded, e.g. LTCA 3: Berwick St. James is assessed as high sensitivity.
- 3. The Landscape and Visual Impact Assessment (LVIA) [APP-045] looked at the settlement patterns within the study area as a whole to establish the local townscape character areas (LTCA) illustrated in Appendix 7.4 to the Environmental Statement [APP-225]. This was to differentiate the 'built environment' from the 'rural' landscape at a local level, as set out in paragraph 2.7 of the Guidelines for Landscape and Visual Impact Assessment, Third Edition.
- 4. Whilst the historic cores and conservation areas could have been identified separately in the LVIA, this additional level of detail was considered to be sufficiently covered within Appendix 6.9 of the Cultural Heritage Setting Assessment [APP-218] for Winterbourne Stoke and Amesbury [APP-218 pages 108 and 125 respectively].
- 5. This differentiation between the assessment for the Cultural Heritage Setting Assessment and the LVIA was considered appropriate to focus on the specific discipline's areas of assessment.
- 6. The LVIA judgements on sensitivity have not been downgraded as they have considered the conservation interest as part of several factors on reaching an overall judgement on the value for a LTCA.
- 7. These factors are derived from Box 5.1 of the Guidelines for Landscape and Visual Impact Assessment (GLVIA 3) which are included in paragraph 7.2.17 of [APP-222]. The LTCA analysis in [APP-225] has also included reference to Conservation Areas and historic cores as part of the assessment on their sensitivity, as well as reviews of Conservation Area Management Plans and Appraisals where available, as set out in paragraph 7.2.6 of [APP-145].



#### Analysis of VPs

Some of the analyses are questionable and are not necessarily accepted. For instance, that for VP30 results in low sensitivity, based on vehicle users as the sole receptor and common highway components of low value. However, the proposal has a marked effect on the visual aspects of the setting of the Countess Farm group of listed buildings, a high value component. Pedestrians using the A345, together with those within curtilages adjacent to the A345, would experience much the same view but would be highly susceptibility to the changes proposed.

Please comment.

- 1. The LVIA does not suggest that the sole receptor in this area is motorists on the A345, rather it aimed to determine a representative view. VP30 was considered to be most representative in this location from motorists rather than pedestrians.
- 2. As you will have seen from document [APP-226]: Visual Baseline, a range of visual receptors (VR) in proximity to Countess Roundabout and Countess Farm were included in the baseline:
  - residents adjacent to the A345 (VR29A and VR29B, [APP-226 page 28];
  - residents at Countess Farm (VR30A, [APP-226 page 28];
  - residents east of Countess (VR30B, [APP-226 page 29]; and
  - pedestrians on Lord's Walk footpath (VR31, [APP-226, pages 22 and 23].
- 3. The effects to these receptors are outlined in full in [APP-228]: Schedule of Visual Effects, and where assessed as significant are listed in document APP 045 Environmental statement Chapter 7 Landscape and Visual Effects, Table 7.11: Summary of significant effects construction, Table 7.12: Summary of significant effects operation year 1 and Table 7.13: Summary of significant effects operation year 15.
- 4. In response to the question about pedestrians, we consider that pedestrians would also be of low sensitivity as whilst Countess Farm group are visible, they are not the reason for the motorist or pedestrians being present in this location, as both types of receptors are both travelling through the area rather than travelling to it. The main focus of the view is the junction at Countess Roundabout which is directly in their field of view.
- 5. For motorists and pedestrians, Countess Farm is already seen in the context of the A345, A303 and Countess Roundabout.
- 6. The Scheme would not screen views of Countess Farm or the listed buildings for VP30 or pedestrians adjacent it.



7. The impact of the Scheme to VP30 and pedestrians would result in a 'greater deterioration' to the view, with significant effects in the construction phase and not significant effects in the operation phase.



#### Chapter 13, para 13.3.22: Driver views

- i. What are the significance criteria for the assessment of effects based on?
- ii. Why have views along the A303 towards Stonehenge not been assessed?

# Response

### i. What are the significance criteria for the assessment of effects based on?

1. The assessment of effects on motorised travellers, including driver views, has been informed by the "Vehicle Travellers" part of the Design Manual for Roads and Bridges guidance (Volume 11 section 3 part 9.2). There is no specific assessment significance criteria associated with driver views set out within this guidance. As such the assessment of effects on driver views is based on the significance criteria in Department for Transport WebTAG appraisal guidance, specifically traveller care elements noted within TAG Unit A4.1.6 para 6.2.7. It has also been informed by best practice from other assessments from comparable transport schemes such as the M25 Junction 28 improvements scheme.

#### ii. Why have views along the A303 towards Stonehenge not been assessed?

- 2. Views along the length of the A303, including towards Stonehenge, have been assessed in Chapter 13 People and Communities [APP-051] using the methodology described in para 13.3.23 with the assessment of effects reported in paras 13.9.51 to 13.9.55; see 13.9.54 specifically for the assessment of driver views along the A303 towards Stonehenge, which are assessed as a major adverse (significant) effect.
- 3. The assessment of drivers' views was included within Chapter 13 People and Communities as it forms a constituent part of the motorised travellers' component of the scope of the People and Communities assessment, as informed by DMRB guidance, namely on "Vehicle Travellers" (Volume 11 section 3 part 9) and "Pedestrians, Cyclists, Equestrians and Community Effects" (Volume 11 section 3 part 8). The motorised travellers' assessment also, on the basis of this guidance, covers matters relating to driver stress and vehicular user severance thus providing a wider analysis on the impact to drivers arising from the Scheme. The initial approach for assessing drivers' views within Chapter 13 was set out in the Scoping Report in the People and Communities section (para 6.8.41 and paras 6.8.69-6.8.71). This assessment was also referenced in para 6.3.82 within the Landscape and Visual section. Assessing driver views along the A303 including towards Stonehenge within Chapter 13 is thus deemed to be consistent with scoping and appropriate based on established guidance and practice.



### **Executive Summary**

- i. How is the distinction made between trees and tree groups?
- ii. Can a tree group contain any number of trees?
- iii. Can a tree feature be either a tree or a tree group?
- iv. Where do hedgerows fit into this picture?
- v. Are any statutorily protected trees affected?

# Response

### i. How is the distinction made between trees and tree groups?

 A tree is an individual specimen, a tree group is a collective of more than one tree, typically in close proximity to one another and assigned maximum dimensions.

### ii. Can a tree group contain any number of trees?

Yes, a tree group can contain or include many trees including informally
maintained hedgerows, copses, clumps or woodland groups. A tree group may
also be made up of scattered individuals where this is deemed appropriate by the
surveyor (e.g. where full access was not possible, and trees were considered
from a distance).

#### iii. Can a tree feature be either a tree or a tree group?

3. A tree feature could be a tree or a tree group. An individual tree cannot be a tree group.

### iv. Where do hedgerows fit into this picture?

4. Hedgerows are recorded at the discretion of the surveyor. Hedgerow features are principally covered as an ecological consideration but where a hedgerow contains significant trees, features trees with stems of 75mm diameter or more or is a significant arboricultural feature, then it is included in the arboricultural assessment.

### v. Are any statutorily protected trees affected?

- 5. Statutory designations of Tree Preservation Orders (TPO) and Conservation Area designations are shown on the Tree Constraints Plan Annexe 7.10.1 of [APP-230].
- 6. The design approach and intention has been to retain all trees protected by a TPO and limit any loss to trees within Conservation Areas and within the Scheme boundary generally.
- 7. A small number of trees at the northern edge of the Amesbury Conservation Area are likely to be removed as set out in paragraph 8.5.5 and illustrated on Tree Removal Plan 5 of 6 in [APP-230], associated with the new drainage design. Any impact to trees located within a Conservation Area requires consultation with



- Wiltshire Council before work can be undertaken. The detail design will establish the likely impact and exact extent of removal; such that it may be that the extent of tree loss could be reduced.
- 8. The method for the protection of all retained trees (including TPO and trees within a Conservation Area) is set out in the Outline Environmental Management Plan (OEMP) [APP-187] including for an arboricultural specialist (OEMP page 13) and preliminary and main work protection (OEMP PW LAN1 page 22, MW G28, page 37 and MWLAN 3, page 45).



### Annex 7.10.2: Tree Survey Schedule

Does the schedule encompass hedgerows?

- 1. Yes, hedgerows are included with the prefix H in the Tree Id (column 1) of the Tree Survey Schedule [APP-230, e.g. page 38].
- 2. Some informal hedgerows featuring established trees may also be recorded as tree groups (with the prefix G).
- 3. Abbreviations are defined in the key in section 7.10.2.1 [APP-230, page 108] at the end of the Tree Survey Schedule.



#### Annex 7.10.3: Tree Removal Plan

- i. Is there a key plan? It is impossible to identify the trees which would be removed, either on the A3 plans or at maximum enlargement on the screen. Please supply the information in a usable form.
- ii. Also, please confirm the appropriate scale at A3 size. Is it 1:5,000 or 1:2,500, since the title block indicates 1:1,000 at A1 size?

- i. Is there a key plan? It is impossible to identify the trees which would be removed, either on the A3 plans or at maximum enlargement on the screen. Please supply the information in a usable form.
  - 1. Highways England will provide the same information split into A1 sheets at 1:1,000 scale and provide a key plan (not to scale as for reference only) to these sheets, all to include appropriate scale bars, to ensure the information provided is capable of use by all readers.
- ii. Also, please confirm the appropriate scale at A3 size. Is it 1:5,000 or 1:2,500, since the title block indicates 1:1,000 at A1 size?
  - 2. We confirm the appropriate scale of Annex 7.10.3: Tree Removal Plan [APP-230, page 110 seq.] is 1:10,000 at A3 size and 1:5,000 at A1. A new scale bar has been added to this plan to ensure clarity.
  - 3. The updated Annex plan and the represented information in the rescaled plans (in sufficient detail to make fully legible tree reference numbers) and key plan will all be issued for Deadline 3.



#### Para 9.11: Summary

This para tells us that the scheme would require the full removal of 182 tree features and 13 tree groups. However, the Executive Summary gives the figures as 178 and 13.

Please clarify.

- 1. The executive summary discounts the 4 Category u (very low quality) trees which are unsuitable for retention regardless of the Scheme. These trees are either dead or in severe decline and have less than 10 years remaining future contribution as arboricultural features. Trees of this quality are not considered a significant constraint in relation to new development.
- 2. Therefore, the trees that are required to be removed specifically as a result of the Scheme are 178 and 13 tree groups.



### Planting scheme

- i. Do outline planting layouts and schedules exist?
- ii. Without them, how were the photomontages assembled?

# Response

#### i. Do outline planting layouts and schedules exist?

1. At this stage, the planting design shown on the Environmental Masterplan [APP-059] is only indicative. Consequently, there are no planting layouts or schedules as these would be prepared as part of the detailed design. However, an Outline Landscape and Ecology Management Plan has been prepared [APP-267]. This describes the planting principles which the contractor would be required to adopt in the detail design and to be approved as a planting plan under requirement 8 of the Draft DCO [APP-020] (see paragraph 1.1.4 of the OLEMP). It includes such requirements as cultivation plant species, planting densities, maintenance and monitoring.

#### ii. Without them, how were the photomontages assembled?

- For the purposes of the photomontages, they were able to be assembled because they were based upon the Environmental Masterplan [APP-045] which provided the indicative location of planting and the Outline Landscape and Ecology Management Plan (Appendix 8.26 of [APP-046]) which provided indicative species.
- 3. The Landscape and Visual Impact Assessment [APP-045] also set out the likely heights of planting at years 1 and 15 of operation (para 7.4.3 and 7.4.4 of Landscape and Visual Impact Assessment [APP-045] for the photomontages. These heights were decided upon by professional judgement based upon experience of landscape design, implementation and management of Schemes, in combination with the assessment process.



#### Outline maintenance programme

Is there an outline maintenance programme for the planting?

# Response

1. An outline maintenance programme has been included within the Outline Landscape and Ecology Management Plan (OLEMP) [APP-267]. For each of the habitat types proposed, short term (0-5years) and long term (over 5 years) management is described together with a monitoring regime. The contractor would be required to adopt the OLEMP in their detailed design and a final maintenance programme, to fulfil the requirements under requirement 8 of the Draft DCO [APP-020] (see paragraph 1.1.4 to 1.1.6 of the OLEMP) to provide a landscaping scheme for approval prior to commencement of works.



### Table 3.4: Western portal approach options

Option (a), vertical retaining walls, is regarded as the less preferable option in landscape/visual terms because it provides a hard-engineered landscape from close viewpoints.

Is this not an example of the failure to appreciate the often critical effect of considering detailed design approach options at an early stage?

Options such as use of a planted living wall could successfully soften the hard landscape allowing it to be visually absorbed more easily into the natural surroundings.

- 1. The Applicant respectfully states that this is an example of how design choices are often a balance between competing interests, including different environmental considerations. For the Western tunnel approaches, the preferred landscape and visual solution would be a softer/greener slope rather than a vertical wall. However, on balance a vertical wall was preferred, due mainly to it having a reduced land take from the World Heritage Site following consultation with Heritage Stakeholders.
- 2. With reference to Section G [APP-059], the proposed design includes more than just a retaining wall. There is a grass slope above the wall which would ensure that in views from both the north and south, the top of the wall is out of sight. In immediate proximity, the walls would be visible in the context of traffic also using the road.
- 3. Notwithstanding the above, as the design is indicative at this stage, it is possible with the consent under the draft DCO that the contractor may propose an alternative solution at the detail design stage, such as a 'living wall' or steep grass or planted reinforced slope, instead of a concrete wall. In this scenario, there would have to be support for an alternative solution from Heritage stakeholders. Furthermore, the contractor would have to demonstrate to the satisfaction of Highways England that an alternative to the vertical wall is not environmentally worse than the illustrative scheme and meets required technical performance and safety standards.



#### Table 3.6: Countess junction options

Have alternatives other than the severe horizontal to the top edge of the noise barrier, depicted in VP 30 been considered?

This does violence to the soft irregular backdrop and foreground of trees and, as in the question above, points to the importance of having in mind at an early stay outline strategies for detailed design, which remain flexible throughout the design process.

- 1. At this stage, no other designs for the noise barrier are being considered. The Scheme is based upon a 1.8-metre-high noise barrier. Without the barrier, alternative noise mitigation measures would be required and vehicles on the flyover would be more visible.
- 2. With reference to Figure 7.68 [APP-146], the vegetated backdrop will remain visible above the noise barriers and therefore we consider that the Scheme will not result in 'violence' to the background, as the skyline would remain vegetated, with the flyover sat beneath this. The Scheme also includes planting on the roundabout and between the proposed A303 and slip roads, which will aid in softening views, as illustrated in Figure 2.5S, section H [APP-059].
- At the detailed design stage, the contractor would be required to develop a
  design for the barriers, providing the necessary requirements of the
  Environmental Statement are met and that the design does not result in more
  adverse impacts than reported.



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