

A303 Amesbury to Berwick Down

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A303 Amesbury to Berwick Down

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Agriculture (Ag.1)

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List of Chapters

General and cross-topic questions (G.1)	1
Agriculture (Ag.1)	2
Air quality and emissions (AQ.1)	3
Alternatives (AL.1)	4
Cultural Heritage (CH.1)	5
Design (De.1)	6
Biodiversity, ecology and biodiversity (Ec.1)	7
Climate Change (CC.1)	8
Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations (CA.1)	9
Draft Development Consent Order (dDCO) (DCO.1)	10
Flood risk, groundwater protection, geology and land contamination (Fg.1)	
Health & Wellbeing (HW.1)	12
Landscape and Visual (LV.1)	13
Noise and Vibration Effects (Ns.1)	14
Socio-economic effects (Se.1)	15
Traffic and Transport (Tr.1)	16
Waste and Materials Management (WM.1)	17



2 Agriculture

Question Ag.1.1

Agricultural Land Classification

The NPSNN requires that account is taken of the economic and other benefits of the best and most versatile agricultural land (grades 1, 2 and 3a of the Agricultural Land Classification) and that applicants should seek to use poorer quality land in preference to that of a higher quality.

The Agricultural Land Classification Plan [APP-179] indicates that a significant portion of the land within the proposed Order Limits are grades 1, 2 and 3a

In addition to the information provided in [APP-294], what regard was had to the requirements of the NPS in respect of the use of agricultural land in considering the route alignment and particularly aspects of the scheme which are not directly dependent on the road alignment (such as the depositing of the tunnel arisings and provision of construction compounds)?

- Detailed agricultural land classification surveys have been undertaken to determine the quality of the agricultural land that would be affected.
- 2. Although the NPS requires that applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification (ALC)) there is no absolute embargo on the development of such land; rather, the NPS requirement is that where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality.
- 3. In the vicinity of the Scheme, the quality of the agricultural land is generally good with wide expanses of best and most versatile (BMV) agricultural land. Any new route alignment of the A303 from fixed end points at Amesbury and Berwick Down (Yarnbury Castle) would therefore affect predominantly BMV agricultural land. It is in this context that the Scheme affects BMV agricultural land, albeit mainly in Subgrade 3a the lowest of the BMV grades and as such accords with the NPS requirement to seek to use the poorer quality land in preference to that of a higher quality.
- 4. With regard to the proposed deposition of the tunnel arisings on BMV agricultural land, once the decision had been taken that an off-site location was inappropriate due to the potential for significant environmental effects (including noise and air quality) a screening exercise was undertaken to rule out any on-site receptor sites which were obviously unsuitable on the grounds of practicality or insurmountable environmental impacts (i.e. in that the physical location of the



works would be such that any impacts from them would be very significant and could not be mitigated) (see Chapter 4 of the Tunnel Arisings Management Strategy [APP-285]). Following the screening exercise, there remained nine potential on-site locations for consideration, all of which were located on agricultural land (see Table 4-5 in the Tunnel Arisings Management Strategy [APP-285]) and which were subject to a comparative assessment. The potential impact on BMV agricultural land was one of the assessment criteria used, with the BMV analysis favouring the High Down site, this being the only one of the nine potential on-site receptor sites having a greater likelihood of lower quality agricultural land. However, the High Down site was discounted on the basis of other factors also taken into account in the comparative assessment.

- 5. Although the site chosen for the deposition of tunnel arisings being land to the east of Parsonage Down is predominantly BMV agricultural land, it adjoins BMV agricultural land in this location which is already required for the construction of the proposed new road and for associated essential landscape mitigation. Therefore, from an operational perspective, the use of the land to the east of Parsonage Down is more efficient and would result in fewer additional environmental impacts than a separate or isolated site.
- 6. Where the depth of deposited tunnel arisings would be less than 2m, the topsoil would be left in situ to preserve the archaeological remains as described in Highways England's response to First Written Question WM.1.7. Where the deposition is to a depth greater than 2m the topsoil would be stripped, impacts on archaeology would be mitigated, and the topsoil would be re-used.
- 7. With regard to the location of the construction compounds, the key driver for their location is the need to be as close to the site of operations as practicable. In the vicinity of the Scheme, where BMV agricultural land is prevalent across the route, ALC did not feature as a determining factor in the choice of location for construction compounds. It is also the case that the use of the land for the construction compounds will be temporary and subject to provisions in the DCO requiring it to be restored to the reasonable satisfaction of the landowner, which is anticipated, where appropriate, to involve restoration to BMV agricultural land. Measures included in the Outline Environmental Management Plan (OEMP) [APP-187] include:
 - MW-G7 The main works contractor shall prepare Management Plans for certain environmental topic areas as the detailed design is developed, to include *inter alia* (g) Soils Management Strategy.
 - MW-GEO3 The main works contractor shall produce a detailed Soils
 Management Strategy that will identify the nature and types of soil that will be
 affected and the methods that will be employed for stripping soil and the
 restoration of agricultural land. The main works contractor shall follow the
 guidance in Construction Code of Practice for the Sustainable Use of Soils on
 Construction Sites (2009) when handling agricultural soils and in particular the
 land to be reprofiled for use as permanent chalk grassland.



- MW-GEO7 Excavated materials management: To form part of the Soils
 Management Strategy, the main works contractor shall develop a: a) Soils
 Handling Strategy, with reference to BS3882: 2015 Specification for Topsoil
 and the Construction Code of Practice for the Sustainable Use of Soils on
 Construction Site. This shall identify locations where archaeological in-situ
 preservation is required (refer to Cultural Heritage section) and consider
 areas to be returned to agricultural use; and b) Soil Resources Plan, which
 will confirm the soil types, the most appropriate re-use for the different types
 of soils and proposed methods for handling, storing and replacing soils onsite.
- MW-COM5 Monitoring of agricultural land: The main works contractor shall undertake further inspections of restored agricultural land with the landowner/tenant and Highways England's soils experts (and valuer, if required) to assess the progress of the restoration. These will be carried out with timing appropriate to any perceived issues or concerns. Concerns will be assessed by all parties and appropriate remedial actions or compensation agreed within the parameters of the compensation code and/or any previous agreements made at the time of acceptance of the initial restoration works and handover to the landowner/tenant.



Construction compound (effect on agricultural land)

- i. How will the effect of the construction compounds on agricultural land be minimised?
- ii. What measures and working practices will be introduced to avoid contamination of the compound areas and adjacent land, and how will this be secured as part of the DCO?
- iii. Would any treatment of waste soils and other material be carried out in the compounds and, if so, what measures would be secured to control and mitigate the potential effects of these operations?
- iv. How will the restoration of the compound sites and condition monitoring of these and adjacent land be secured as part of the DCO?
- v. What would trigger remedial works and how would this be secured/verified?

- i. How will the effect of the construction compounds on agricultural land be minimised?
- 1. The use of construction compounds would be temporary with the land restored to agriculture (to the landowner's reasonable satisfaction in accordance with article 29 of the draft DCO [APP-020], and in accordance with the measures set out at MW-COM3 to COM5 of the Outline Environmental Management Plan (OEMP) [APP-187]) following completion of the construction programme. Prior to commencement the main works contractor would produce a detailed Soils Management Strategy that would identify the nature and types of soil that would be affected and the methods that would be employed for stripping soil and for the restoration of agricultural land post works (secured through Item MW-GEO3 of the OEMP [APP-187]).
- ii. What measures and working practices will be introduced to avoid contamination of the compound areas and adjacent land, and how will this be secured as part of the DCO?
- 2. The main works contractor would follow the guidance in the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2009) when handling agricultural soils (secured through Item MW-GEO7 of the OEMP [APP-187]).
- 3. The specific detail of how the compounds would be set up and used would be established during the detailed design process, but the compounds would be fenced securely to ensure no livestock can enter the site (such fencing to be developed in liaison with landowners (secured through item MW-COM3 of the OEMP); likewise, no construction machinery would enter the neighbouring agricultural land (as Highways England would have no power to do so). The contactor would control all potentially contaminative materials in accordance with



the Control of Substances Hazardous to Health (COSHH) Regulations (secured through Item MW-GEO6 of the OEMP [APP-187]) and, as defined in MW-GEO8 [APP-187], construction activities would follow good practice guidelines to avoid contamination from leaks, spillages and inappropriate storage of materials on site.

- iii. Would any treatment of waste soils and other material be carried out in the compounds and, if so, what measures would be secured to control and mitigate the potential effects of these operations?
 - 4. Item MW-MAT5 of the OEMP [APP-187] sets out the requirements for the on-site management of waste including soil waste management. Waste treatment is a permitted activity which itself would place controls on the treatment process and potential impacts from the treatment activity on the environment. Furthermore, OEMP item MW-GEO08 requires that construction activities would follow good practice guidelines to avoid contamination from leaks, spillages and inappropriate storage of materials on site. OEMP MW-WAT07 provides a number of measures specifically to control the pollution of waterbodies from construction activities, which would include on-site soil treatment.
- iv. How will the restoration of the compound sites and condition monitoring of these and adjacent land be secured as part of the DCO?
 - 5. Item MW-G30 of the OEMP [APP-187] requires that on completion of the construction works, the land occupied by temporary compound sites is restored to its former use in accordance with the design as appropriate.
 - 6. Following completion of the works, the main works contractor would restore the land to agriculture having first agreed with the landowner / tenant the detail for restoration (secured through Item MW-COM4 of the OEMP [APP-187]). The land restoration would be subject to a period of aftercare where management decisions concerning the land would be driven by the needs of the soil, rather than agricultural productivity; the landowner would be entitled to compensation under statutory provisions (secured through Item MW-COM5 of the OEMP [APP-187]).
- v. What would trigger remedial works and how would this be secured/verified?
- 7. Should the quality of the agricultural land restoration be poor, such concerns would need to be assessed by all parties and appropriate remedial actions or compensation agreed within the parameters of the compensation code and/or any previous agreements made at the time of acceptance of the initial restoration works and handover to the landowner/tenant (secured through Item MW-COM5 of the OEMP [APP-187]).



Agricultural land (access)

A number of RRs, including that from the National Farmers' Union [RR-2252] raise concerns and queries in respect of the effect of the use of existing and proposed rights of way on agricultural land.

- i. Please provide a detailed justification for proposed creation of each new public right of way which would affect existing agricultural land?
- ii. What consideration has been given to prevent any improper use of the existing and proposed Public Rights of Way (PRoW) network (including fly tipping, hare coursing, parking and camping) and how would any measures be secured as part of the DCO?
- iii. What arrangements would be put in place for the maintenance (including future responsibilities) of any new PRoW including associated infrastructure such as fencing and barriers?
- iv. The scheme includes the creation of a new restricted byway open to agricultural vehicles along part of the existing A303. How will the surfacing, gates, and other barriers be designed and secured to ensure it is appropriate to allow for access and use by agricultural vehicles?

- i. Please provide a detailed justification for proposed creation of each new public right of way which would affect existing agricultural land?
- The Applicant wishes to ensure that the Scheme is integrated within the existing byway network and, where the opportunity exists, to create legacy benefits for non-motorised users in accordance with its Strategic Business Plan and Road Investment Strategy, which are aligned with Government policy to encourage walking, cycling & horse-riding through national and local policies and plans. Details are shown on the Rights of Way and Access Plans [APP-009] and described in Schedule 3 to the draft DCO [APP-020]. This approach aligns with Government policy to encourage cycling and walking (Cycling and Walking Investment Strategy https://www.gov.uk/government/publications/cycling-andwalking-investment-strategy). The proposals would link Yarnbury Castle and Winterbourne Stoke and allow access all the way through the WHS to Amesbury, making it easier for walkers, cyclists and horse riders to access and enjoy the WHS. The majority of the new public rights of way would be restricted byways accessible to pedestrians and those using mobility scooters, cycles, horses and carriages. These routes would not be available for the public use of motorised vehicles.
- 2. Each of the new highways created by the Scheme is described in detail in Schedule 3, by reference to a commencement point and a termination point, both of which are described by reference to existing landmarks, as well as being



shown on the Rights of Way and Access Plans. In addressing this question, the Applicant has understood the question relates to the categories of highway that would not in ordinary parlance be called a "road", which is to say the byways open to all traffic, restricted byways, bridleways and footpaths created by the Scheme.

- 3. Article 2 of the DCO adopts the established legal definitions for these categories of highways. In practice this means that each can be used by the following:
 - Footpath: pedestrians, mobility scooter users, wheelchair and powered wheel chairs users ("Footpath Users")
 - Bridleway: Footpath Users, plus horse riders and pedal cyclists ("Bridleway Users");
 - Restricted byway: Bridleway Users plus drivers/riders of non-motorised vehicles (such as horse-drawn carriages) ("Restricted Byway Users");
 - byway open to all traffic ("BOATS"), Restricted Byway Users plus motor vehicles.
- 4. Where possible, new public rights of way are to be provided parallel to existing or proposed highway, or along existing field boundaries, to minimise the impact on agricultural land.
- 5. In addition to serving the public, many of the new public rights of way are also required to serve as private vehicular accesses to agricultural land that would otherwise be severed from the highway network by the removal of the existing A303.
- 6. The Scheme's public rights of way and private means of access proposals are shown on the Rights of Way and Access Plans [APP-009] and are described in detail in Schedule 3 to the draft DCO [APP-020]. Detailed justification for the proposed creation of each new public right of way (including those which would affect existing agricultural land) is set out below.

Restricted Byways References A and B (Sheets 1, 2 and 3 of the Rights of Way and Access Plans)

- 7. Restricted byway reference A is shown on sheets 1 and 2 of the Rights of Way and Access Plans. Restricted byway reference B is shown on sheets 1, 2 and 3 of the Rights of Way and Access Plans. Both would require the acquisition of agricultural land. Together they provide links between the existing byway network to the west (via SLAN3) and the village of Winterbourne Stoke. As an alternative route to the A303, restricted byways references A and B run generally parallel to the carriageway of the new and improved A303, B to the north and A to the south. Both routes provide an alternative for Restricted Byway Users travelling on the network.
- 8. The eastern section of restricted byway reference B crosses Green Bridge One before crossing a field to the existing A303 (to be de-trunked and become a quiet lane) into Winterbourne Stoke. Following feedback from the landowner following



- statutory consultation, the route between Green Bridge One and the former A303 was altered to reduce the impact on the field while also avoiding buried archaeology.
- 9. The green bridges on the Scheme perform a number of functions, including providing agricultural access, linking and maintaining public rights of way; and providing ecological connectivity. The locations of the green bridges strike a balance that meets the needs of these functions. Green Bridge One has to be where it is positioned because it serves agricultural access in this location and would also provide ecological connectivity with Parsonage Down SSSI for species of chalk grassland and provide potential connectivity for bats. As the western-most crossing of the new dual carriageway, the proposed bridge was also located to enable restricted byway reference B to cross the A303.
- 10. In addition restricted byways references A and B provide replacement private means of vehicular access, references 1, 2 and means of access for the benefit of agricultural land affected by the stopping up of private means of access references a, b and c.

BOAT Reference C (Sheet 2 of the Rights of Way and Access Plans)

11. The land required for this change is existing bridleway and private track (i.e. not agricultural land) and is required to serve agricultural land. As shown on Sheet 2 of the Rights of Way and Access Plans, Highways England proposes to stop up part of the existing Bridleway BSJA3, to the west of Winterbourne Stoke and replace it with a Byway Open to All Traffic. This would enable vehicular access from the new BOAT reference D, and the private means of vehicular access served by restricted byway reference A, to connect with the existing BOAT BSJA3. BOAT reference C would permit vehicular access to agricultural land, reference 3.

BOAT Reference D (Sheets 2 and 3 of the Rights of Way and Access Plans)

12. The BOAT reference D is to the west of Winterbourne Stoke. It runs parallel to the existing A303 until the new and improved A303 departs from the existing A303 alignment. It would then run along the alignment of the existing A303 (to be stopped up) to the outskirts of Winterbourne Stoke. It would provide a link between the existing byway open to all traffic network to the west (BSJA3) and the village of Winterbourne Stoke. Where BOAT reference D runs parallel to the proposed carriageway, agricultural land would be required. East of this it follows the existing A303, but with a reduced width. It would also serve to connect neighbouring agricultural land to the highway network once the existing A303 to the west of Winterbourne Stoke is stopped up, see private means of access references 4 and 5.

BOAT Reference EA (Sheet 3 of the Rights of Way and Access Plans)

13. BOAT reference EA is a minor realignment of part of the existing BOAT WSTO3 necessary to tie the existing BOAT into the re-aligned B3083 and would not require additional agricultural land.



BOAT Reference F (Sheet 4 of the Rights of Way and Access Plans)

14. BOAT Reference F facilitates the continuation of travel along the existing byway, WSTO6B, which would otherwise be severed by the new A303. This route provides a minimal diversion from WSTO6B's original alignment and would require additional agricultural land. This diversion is necessary to provide the elevation difference required to bridge the A303. The diversion also allows the crossing of the A303 perpendicular to the carriageway alignment and therefore spans the shortest distance. It is additionally required to provide a private means of vehicular access to the land to the west of WSTO6B, of which includes access to a proposed drainage pond, reference 10.

Restricted Byway Reference IA (Sheet 5 and 15 Rights of Way and Access Plans)

15. Restricted byway, reference IA provides a link between the proposed restricted byway near the existing Longbarrow junction in the north, the existing restricted byway BSJA9 to the west and new bridleway (Bridleway Reference V) to the south. Agricultural land would be required for the length south of the tie-in of the new A360 link to the existing A360. It follows the route of the existing A360 highway to be stopped up, and thus creates no new agricultural severance. It would also serve as a means of vehicular access to agricultural land, references 16, 17, 18. It is carried over the existing A303 by Green Bridge Four.

Restricted Byways References I, IB, J (Sheets 5, 6, 7 & 8 Rights of Way and Access Plans)

16. The land required for these restricted byways is comprised within existing highway to be stopped up (parts of the existing A303, A360 and Stonehenge Road) and so do not require agricultural land. These restricted byways would also serve as private means of vehicular access to agricultural land, necessitated by the stopping up of the existing A303 within the WHS and the provision of the new Longbarrow Junction, references 12, 13, 14, 15, 19, 20, 21, 22, 23, 24, 25, 26 and 27.

BOAT Reference N (Sheet 11 Rights of Way and Access Plans)

17. BOAT reference N would prevent the creation of a dead end on existing byway AMES 1 consequent on the closure of the junction with A303. BOAT reference N provides a connection between AMES 1 and Equinox Drive, and the local highway network. BOAT reference N would be on land currently laid out as highway but which the Applicant understands has not been dedicated as such by the landowner, nor adopted by Wiltshire Council. As such the provision of this short section of BOAT would not affect agricultural land.

Footpath Reference P (Sheet 11 Rights of Way and Access Plans)

18. Footpath Reference P would replace the existing BOAT AMES1. It would be provided on existing highway and as such has no impact on agricultural land.



Restricted Byways References U and UA (Sheet 14 Rights of Way and Access Plans)

19. Restricted byways references U and UA together provide a link from the new Longbarrow junction in the south to Airman's Corner in the north. Agricultural land would be required for the length of restricted byway reference U north of the tie-in of the new A360 link to the existing A360. This link provides a connection between the proposed right of way network (at the new Longbarrow junction) to the wider rights of way network. In addition, this route also facilitates connection to the Stonehenge Visitor centre, which is a major tourist attraction in the area. As this route runs parallel to the A360 it minimises the impact on agricultural land and retains the same level of directness as the road would have provided. Being situated on the east of the A360 gives the route good views over the world heritage site therefore making it more attractive to non-motorised users. Restricted byway U would also serve as a private means of vehicular access to agricultural land, reference 32.

Bridleway Reference V (Sheet 15 of the Rights of Way and Access Plans)

20. Bridleway reference V extends the connection from the existing Longbarrow junction in the north (via Route IA above) to the junction between the A360 and existing byway open to all traffic WFOR16 (commonly referred to as "Byway 12"). Agricultural land would be required for this bridleway. As this route runs parallel to the A360 and an existing field boundary it minimises the impact on agricultural land and retains the same level of directness to Bridleway Users as the road would have provided. Being situated on the east of the A360 gives the route good views over the world heritage site therefore making it more attractive to bridleway users. From the southern end of WFOR16, byway WFOR15 and public footpaths (WFOR8 and WFOR9) are accessible.

Bridleway Reference Y (Sheet 5 of the Rights of Way and Access Plans)

21. Bridleway reference Y provides a key link in the route between Winterbourne Stoke and Amesbury for Bridleway Users. Agricultural land would be required for this bridleway. The route provides a more direct alternative to traveling along the proposed Longbarrow junction southern link. It is not possible to provide a safe link for carriages at the western end of Route Y. This is because carriages travelling west-bound would arrive at the southern roundabout with no way of safely crossing the A360. The alternative route is via Restricted Byway reference IA and the new A360 southern link. Other users of the bridleway would be able to use the signalised crossing of A360 at this location.

Bridleway Reference Z (Sheet 4 of the Rights of Way and Access Plans)

22. Bridleway reference Z provides an off-road route for Bridleway Users between Winterbourne Stoke and Longbarrow Junction. Agricultural land would be required for this bridleway. This route links the existing rights of way network through its junction with existing byway WSTO6B (which would be re-aligned over the new and improved A303, see BOAT Reference F above). This route



would be of significant benefit to local people, encouraging walking and cycling, and adding to the amenity of the area. It would connect these users, as well as equestrians, to the new public rights of way proposed within the WHS, providing convenient safe access and the opportunity for the WHS to be explored and enjoyed. At its eastern end, Bridleway reference Z would be subsumed within the highway boundary of the new highway reference G but suitable off-carriageway facilities would be provided to enable bridleway users to safely traverse the southern roundabout at the new Longbarrow Junction and to continue their journey along the public rights of way network.

- ii. What consideration has been given to prevent any improper use of the existing and proposed Public Rights of Way (PRoW) network (including fly tipping, hare coursing, parking and camping) and how would any measures be secured as part of the DCO?
- iii. What arrangements would be put in place for the maintenance (including future responsibilities) of any new PRoW including associated infrastructure such as fencing and barriers?
- 23. To prevent improper use of the existing and proposed Public Rights of Way (PRoW) network, fences and gates would be provided. The detail of these will follow at the detailed design stage if development consent for the Scheme is granted.
- 24. At this stage it is envisaged that fences along public rights of way would be provided to prevent access onto private land, grazed grassland or the highway, or to provide a buffer zone to the retained cutting between Longbarrow junction and the western tunnel entrance. Kent Carriage Gaps would be provided at access points to restricted byways, preventing entry by mechanically propelled vehicles. Equestrian gates would be provided at access points to bridleways and pedestrian gates would be provided at access points to footpaths. This is subject to detailed design of these matters and discussions with Wiltshire Council. Within the World Heritage Site, the OEMP [APP-187], reference D-CH14, requires the provision of fencing and surfacing to be developed in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council.
- 25. Article 9 of the draft DCO [APP-020] makes provision for the public rights of way provided by the Scheme to be maintained by Wiltshire Council. Wiltshire Council could also use its powers to prevent unlawful use of the existing and proposed Public Rights of Way. Highways England is in discussions with Wiltshire Council concerning matters arising from its maintenance of roads affected by the Scheme.
 - iv. The scheme includes the creation of a new restricted byway open to agricultural vehicles along part of the existing A303. How will the surfacing, gates, and other barriers be designed and secured to ensure it is appropriate to allow for access and use by agricultural vehicles?



26. The detail of the fencing and gating strategy for the PRoWs will follow at the detailed design stage. At this stage it is envisaged that fences along public rights of way would be provided to prevent access onto private land, grazed grassland or the highway, or to provide a buffer zone to the retained cutting between Longbarrow junction and the western tunnel entrance. Where necessary for adjacent land use, appropriate stock-proof netting would be added to strained wire or other boundary treatment provided by way of accommodation works, as agreed between Highways England and the adjacent landowner. Indicative details are available in Series 3 of the Highway Construction Details, Manual of Contract Documents for Highway Works

http://www.standardsforhighways.co.uk/ha/standards/mchw/vol3/section1/h_series.pdf. These details will be agreed with affected landowners through ongoing dialogue regarding accommodation works.



Agricultural land (access)

- i. With reference to [RR-1977] please provide the rationale for the indicative location of Green Bridge One.
- ii. Please also set out what alternative provision for access between the land occupied by Berwick Down Ltd to the north and south of the A303 was considered and why this was discounted.
- iii. What proposals could be put in place to minimise the effect on access between the two areas of land?

- i. With reference to [RR-1977] please provide the rationale for the indicative location of Green Bridge One.
- Relevant representation reference [RR-1977] raises concerns that Green Bridge No.1 would not provide an adequate access to link land owned by Berwick Down Limited which is currently bisected by the existing A303. It requests that Green Bridge No.1 is relocated further to the west such that it would enable direct access to land that is currently, and will continue to be if the Scheme is approved, bisected by the existing A303.
- 2. The green bridges on the Scheme perform a number of functions, including: providing agricultural access, linking and maintaining public rights of way; and providing ecological connectivity. The locations of the green bridges strike a balance that meets the needs of these functions. Green Bridge No. 1 has to be where it is positioned because it would provide ecological connectivity with Parsonage Down SSSI for species of chalk grassland, provide potential connectivity for bats, serve agricultural access in this location, as well as accommodating a new public right of way. Details can be found in section 8.8 in ES Chapter 8, Biodiversity [APP-046].
- ii. Please also set out what alternative provision for access between the land occupied by Berwick Down Ltd to the north and south of the A303 was considered and why this was discounted.
- 3. The existing crossing of the A303 used by Berwick Down Limited is on the single carriageway section of A303 west of Scotland Lodge, references 2 and 3, near bridleway BSJA3A (see sheet 2 of the Rights of Way and Access Plans [APP-009]).
- 4. Alternative crossing facilities have been considered to replace these accesses. The option to leave the existing crossing in place is not acceptable to Highways England on operational and safety grounds. Two alternatives were identified, an overbridge and an underpass. Both options would require significant earthworks to be constructed within the fields owned by Berwick Down Limited, and would



- require an ecological corridor to be created across the field between the A303 and Parsonage Down reserve, removing productive agricultural land.
- 5. An overbridge at the proposed location would not provide the same ecology benefits provided by Green Bridge One as the connection would be lost between the area to the south of A303 and 03-01 on Sheet 3 of the Land Plans [APP-005]. This plot is to be acquired for essential mitigation to create species-rich chalk grassland. A bridge would also create significant visual intrusion on the sky line and a negative impact on the setting of nearby Yarnbury Castle and would not meet wider policy tests and was therefore discounted.
- 6. An underpass option would not provide the same ecology benefits as an overbridge, except possibly for bats, and would not to be appropriate due to buildability constraints it also has a similar footprint to the overbridge due to the necessary earthworks, requiring a similar amount of land. As an alternative route will be available this option was also discounted.

iii. What proposals could be put in place to minimise the effect on access between the two areas of land?

- 7. Access between the two areas of land owned by Berwick Down Limited either side of A303 will be provided via the two proposed rights of way and Private Means of Access (PMA), labelled reference B on sheets 1, 2 and 3, reference D on sheets 2 and 3 of the Rights of Way and Access Plans [APP-009] and described in Schedule 3 to the draft DCO [APP-020]. These routes are connected via the existing A303 and Green Bridge One, which would be wide enough to accommodate agricultural vehicles that are permitted under The Road Vehicles (Authorised Weight) Regulations 1998 and The Road Vehicles (Construction and Use) (Amendment) Regulations 1996.
- 8. Following de-trunking of the A303, access to the Berwick Down Limited northern field can be via the local highway, which will become a convenient route between the farm base and new restricted byway B (as shown on Sheet 3 of the Rights of Way and Access Plans [APP-009]) over which the land owned by Berwick Down Limited would benefit from a private right of vehicular access. However, direct access between the fields north and south of A303 will no longer be available. Operational issues arising from the loss of direct access between the two fields would be dealt with through compensation to be agreed by the District Valuer.



Agricultural land (access)

Please provide a detailed justification for the location and scale of Green Bridge Four, including why this location, and alignment of the associated proposed restricted byway, has been chosen instead of an alignment which follows the existing A360.

- 1. The location and scale of Green Bridge No. 4 was selected in response to statutory consultation in February to April 2018 and was subsequently included in the supplementary public consultation. At the time of the statutory consultation, the Project Team received feedback from Heritage Partners (including Historic England and the National Trust) that Green Bridge No. 4 was not wide enough or in the right position. Taking on board this feedback, Green Bridge No. 4 was moved eastwards (to the east of the A360 alignment) and widened from 50m to approximately 150m as presented at supplementary consultation and in the current Scheme. Details of supplementary consultation are set out in the Consultation Report [APP-026], Chapter 6: Supplementary Consultation and summarised in the Assessment of Alternatives [APP-041], ES Chapter 3, section 3.3.
- 2. The changed location and increased width were in order to maximise the physical and landscape connectivity between the Winterbourne Stoke Crossroads Barrows and the Diamond Group and, in particular, the two upstanding long barrows in each group in this western part of the WHS. The revised location and width achieved this connectivity to a much greater extent than either of the previous 50m wide bridges considered during the original optioneering. The greater physical and landscape connectivity of Green Bridge No. 4 and its positioning to maximise this was recognised as being more important than maintaining the line of the historic route (which does not contribute to the OUV of the WHS as it dates to the post-medieval period) and land form on the line of the WHS boundary and the current A360.
- 3. The location and scale was agreed with heritage stakeholders. The alignment of the proposed restricted byway necessarily utilises the land bridge to maintain connectivity and access for permitted users: the existing right of way along the A360 will be severed by the alignment of the A303 in cutting.



Agricultural land (access)

Please set out a response to the access concerns raised in [RR-2237].

- 1. The Applicant's Relevant Representations Report [AS-026] provided responses to the access concerns raised in [RR-2237]. Those responses are repeated, and where necessary, further detailed here.
- 2. RR-2237: This representation assumes that the Minutes of any meetings held with Highways England will be available to you specifically in relation to the difficulty the scheme as proposed presents in terms of my business being provided with sufficient access to a metalled highway.
- 3. Highways England: Minutes from meetings held with Highways England will be available to the Planning Inspectorate where requested or where submitted as evidence.
- RR-2237: The point cannot simply be sufficiently explained by being limited to 500 words. Essentially, as I am a Partner in West Amesbury Farms which incorporates West Amesbury Farm (tenanted), Park Farm West Amesbury (owned) and Stockport Farm Amesbury (owned) I need to be provided with unrestricted including unencumbered covenants with a third party to the Countess Road as in particular my Combine Harvester due to its size and turning circle, is unable to be driven as envisaged by Highways England through Amesbury. Unless access is provided which is a statutory right my holdings will be severed from each other. The solution is that a road needs to be built to the Countess Road from Park Farm West Amesbury on land owned by the National Trust. This was previously envisaged in 2004. This will then provide me with an uninterrupted right of access at all times as I currently enjoy to allow my business to continue and grow. Highways England although fully aware of the situation have not yet come forward with any potential solution. The land at Countess Farm is owned the National Trust but I believe this land is not inalienable as it was purchased rather than gifted and Highways England of course have the statutory powers to provide the required access but they appear particularly reluctant to do so. Even if the land is inalienable Highways England still have sufficient powers to be able to compulsory purchase the land to provide the access. There is therefore a clear case that the provision of access for my business needs to be examined further and an acceptable solution found.
- 5. Highways England: Farm access arrangements at Park Farm and West Amesbury Farm continue to be discussed with the affected landowner and tenant. Highways England are seeking to agree suitable alternative access arrangements with the two farms, which includes a new access to Countess Road for vehicles such as combine harvesters unable to negotiate the roads through Amesbury. The access required is beyond the Scheme's Order limits,



- therefore separate discussions with the National Trust (landowner) and another tenant at Countess Farm are ongoing in parallel with the DCO process. The suggested route from the 2004 Scheme has now been deemed unsuitable by the landowners, the National Trust. If suitable alternative access arrangements are unachievable then appropriate compensation will be assessed.
- 6. RR-2237: I also have concerns that again should be examined further about the future of Stonehenge Road and the proposal to close this at the point of entry from Stonehenge Road to West Amesbury Farm is in the incorrect position. The correct position is where the Wishford Road now joins the Stonehenge Road closest to Amesbury.
- 7. Highways England: The section of Stonehenge Road from its junction with the A303 in a generally south-easterly direction to its junction with footpath AMES 13 is, for the purposes of the Scheme, proposed to be converted to a restricted byway. Private means of access rights would be provided for Stonehenge Cottages and adjacent landowners. The extent of the converted Stonehenge Road is shown on the Rights of Way and Access Plans [APP-009] hatched as a 'new right of way and new private means of access and is also labelled on those Plans as part of the new restricted byway, reference J. The proposed extension of the restricted byway to the junction of Wishford Road and Stonehenge Road would restrict access to a number of properties in West Amesbury. These properties currently have access along a lane running south then south-west from Stonehenge Road, commencing approximately 270 metres north-west of the junction, opposite Park Farm.
- 8. RR-2237: If the proposal as currently made proceeds it is highly likely that the area between the Wishford Road and where Stonehenge Road is gated off will be used for potentially immoral and illegal purposes and I am sure that Highways England do not want to be seen to be giving this type of opportunity to those involved in those activities.
- 9. Highways England: The management and enforcement of access across the WHS is a matter for Wiltshire Council (as the local highway authority with responsibility for the public rights of way in its administrative area), as well as landowners, including the National Trust and English Heritage. Wiltshire Council as highway authority is content that the length of road referred to remains as highway. The existing highway boundaries will remain as existing.
- 10. RR-2237: Insufficient detail has been made available about how the de-trunked A303 to the Longbarrow Roundabout is to be managed and what surface will remain. I need to get my Combine and associated equipment to Shrewton for contracting purposes. I believe that this should also be fully examined at this stage as a tarmac surface should be maintained to assist the vast number of agricultural related movements undertaken by the land occupiers and associated industries who rely on the existing A303 as their main thoroughfare.



- 11. Highways England: Any farm vehicles that are able to currently use the highway network will continue to be able to use the A303 via the tunnel. The redundant parts of the road surface of the existing A303 and A360 within the WHS would be removed in accordance with references D-CH2 and D-CH3 of the OEMP [APP-187]. Compliance with the OEMP is secured by paragraph 4 of Schedule 2 to the draft DCO [APP-020]. The new restricted byway within the WHS would provide a durable surface for non-motorised users including those needing mobility aids, and those vehicles authorised to use the relevant sections of the route such as agricultural and maintenance vehicles.
- 12. Excet for occasional farm and utility vehicles gaining access to adjacent farmland and services, no motor vehicles would be permitted on the former A303 through the WHS, which would become a restricted byway. A key objective of the Scheme is the removal of the sights and sounds of traffic from within the WHS. Opening the downgraded A303 within the WHS to mechanically propelled vehicles (MPVs) would be contrary to this objective.
- 13. The only motorised vehicles that will be prohibited from using the tunnel are: abnormally high-sided vehicles and motorcycles <50cc. Full details of the public rights of way proposals, including the small number of modifications being made to the existing network, are shown on the Rights of Way and Access Plans [APP-009].



Agricultural land (access)

The OEMP [APP-187] provides a commitment to liaise with landowners in terms of access to land.

- i. What measures will be put in place to ensure access to land is maintained during the construction period and to mitigate the effects on land which would be severed as part of the proposed development?
- ii. In addition, is it the intention of the applicant to allow agricultural landowners/tenants to utilise the haul roads to allow access to land?

- i. What measures will be put in place to ensure access to land is maintained during the construction period and to mitigate the effects on land which would be severed as part of the proposed development?
- In addition to the measures in the OEMP relating to liaison with landowners and other persons (references PW-COM1, MW-COM1, MW-COM2, MW-COM3 and MW-COM5, secured by requirement 4 of the DCO [APP-020]), access to premises will be maintained during the operation of the Scheme and during its construction.
- This is ensured by the scope of the powers available to the undertaker under the DCO. Article 10 of the draft DCO [APP-020] makes provision for the stopping up and replacement of private means of access. In accordance with paragraph (2)(a) of that article, a private means of access, that is to be replaced and is listed in Part 3 of Schedule 3, may only be permanently stopped up once the replacement private means of access has been completed to the reasonable satisfaction of the street authority. Article 10(2)(b) makes provision for a temporary alternative route to be put in place, pending the completion of the replacement means of access specified in Part 3 of Schedule 3. However, not all private means of access to be stopped up will be replaced, the single instance where this is not the case is listed in Part 4 of Schedule 3, and shown on sheet 5 of the Rights of Way and Access Plans, reference h. This private means of access currently provides entry to the field located on the south-west side of the existing Longbarrow roundabout from the existing A303 (to be stopped up), part of this land parcel is to be permanently acquired by Highways England for the new A303 and Longbarrow grade separated junction, thereby removing the need for this access.
- ii. In addition, is it the intention of the applicant to allow agricultural landowners/tenants to utilise the haul roads to allow access to land?
- 3. It is anticipated that landowners will not be able to make use of the haul routes. Safe crossing points will be identified to manage agricultural traffic that needs to cross the haul route, the contractor will liaise with the agricultural users to ensure



that these are best placed to meet both requirements in accordance with the OEMP measures previously identified, MW-COM1 in particular.



Agricultural land (access)

Concern has been raised in [RR-1980] that the proposed new restricted byway running north/south at the proposed Longbarrow Junction would result in a small triangular field which may be impracticable to farm commercially.

- i. What consideration was given to avoiding creating small, irregularly shaped parcels of land in creating new/rerouted byways.
- ii. What alternatives would be feasible to minimise or avoid this?

Response

- i. What consideration was given to avoiding creating small, irregularly shaped parcels of land in creating new/rerouted byways.
- 1. Where possible, the new and re-routed rights of way are aligned alongside existing highways or field boundaries to minimise impact on agricultural land. Where feasible efforts have been made to avoid the creation of irregular, isolated or small parcels of residual land. However, ultimately the Scheme must allow for a design that conforms to the design standards for highways, meets the Scheme's objectives and government policy, is safe and balances the environmental impacts and effects on land interests and owners.
- 2. Accommodation work discussions are in progress with affected landowners and occupiers, and Highways England will continue to engage with landowners in order to seek to reduce the impacts of severance on farming activities. If this is unachievable, however, there may be an entitlement to compensation for severance, for example where the resultant shape of the retained field parcels, or associated access restrictions, were to restrict the use of the land, for instance by making future farming operations difficult or impractical.

ii. What alternatives would be feasible to minimise or avoid this?

- 3. The Applicant considered an alternative alignment to the restricted byway reference IB as shown on Sheet 5 of the Rights of Way and Access Plans [APP-009]), which runs north from the existing Longbarrow Roundabout. The alternative considered would enable the smaller field to the west of the existing A360 to be incorporated into the larger field to the east. This would require the new restricted byway to take an alternative route alongside the new A360 link from the new Longbarrow Junction Northern Roundabout (reference H on Sheet 5 of the Rights of Way and Access Plans).
- 4. This option was rejected for the following reasons:
 - a. It would have created a circa 600m detour for users of the restricted byway travelling along the north-south axis to / from the Stonehenge Visitor centre and would be further away from the WHS. This would detract from the objective of improving Non-Motorised User (NMU) accessibility to the WHS.



- b. It would provide a less attractive route for NMU users; the route would be in close proximity to the A360 and Longbarrow junction and would therefore have increased noise and air quality effects associated with traffic and reduced visual amenity related to both traffic and highway infrastructure.
- c. The alignment of the new restricted byway along part of the redundant A360 provides a more sustainable use of the existing road infrastructure and does not necessitate the construction of an entirely new alignment.



Agricultural land (access)

In [RR-1594] a concern is raised in respect of stopping up a bridleway which has been referenced as Plot 7-19 (which is not a Plot shown on the Land Plans or in the Book of Reference).

- i. Please provide clarity as to which area of land, the bridleway and the MOD land refer to is located?
- ii. Can the applicant provide a response to the concerns raised?

- i. Please provide clarity as to which area of land, the bridleway and the MOD land refer to is located?
- Clarification was received from Howard Smith (the agent for Mr P J Rowland) that "Plot 7-19" was incorrectly typed in RR-1594 and that it should read "Plot 11-19". This was confirmed via email and a telephone conversation on 18/03/2019 with the A303 Highways England team.
- ii. Can the applicant provide a response to the concerns raised?
- 2. The DCO application includes provision for a private means of access for the benefit of the triangle of land on the north side of the A303 (at the eastern end of the Scheme), currently bisected by byway BULF12 and its continuation byway AMES2, both of which are proposed to be stopped up in furtherance of the Scheme. The proposed new private means of access is shown on the Rights of Way and Access Plans as reference 28 on Sheet 11 [APP-009] (see inset 2 on Sheet 11). The private means of access would follow the line of existing byway BULF 12, such that access would be taken from the south side of the crossroad junction of Amesbury Road and the B3028 Double Hedges (at the top of the triangle of land).



Agricultural land (access)

In [RR-1594] a concern is raised that there is an agricultural access in the north east corner of the field located to the south of Land Plan plot 11-09. It does not appear that a new private means of access is proposed for this land when the new proposed carriage way would be created.

Please confirm whether an access will be provided or provide reasons why this is not proposed.

Response

1. The existing field accesses would continue to be available for local landowners. These are in the north east corner of the field located to the south of Land Plan plot 11-09 (Earls Farm Down) and from byway AMES1 (Amesbury Road). It is accepted that the existing access from AMES1 immediately south of the Ratfyn barrow group may be more difficult from the south and alternative arrangements are being explored in consultation with the landowner and tenant. The Accommodation Works plans will be updated when agreed, as discussed with Mr C Rowland on 27th March 2019.



Agricultural land (access)

Concerns have been raised in [RR-1594] in respect of access to agricultural land to the east of Solstice Park. Equinox Drive will link to a new carriageway and provide a new route to access this agricultural land (with existing byways stopped up).

What consideration has been given to any measures necessary to ensure that access to this agricultural land, for larger machinery, will not be impeded through the parking of vehicles on Equinox Drive, or the new proposed carriageways?

- Parking restrictions on the local road network are a matter for the local highway authority, Wiltshire Council who will become the highway authority for Equinox Drive. Highways England is in discussions with Wiltshire Council in connection with matters that relate to the maintenance of highways for which it will become the highway authority.
- 2. In respect of the new Allington Track link, the Scheme makes adequate provision for its use by agricultural vehicles. Highways England is in discussions with the landowner in connection with the provision of accesses to the agricultural land referred to in the question.



Agricultural land (drainage)

How has the indicative size and locations for the drainage treatment areas/infiltration basins and other drainage infrastructure been considered to minimise the effect on operational agricultural land?

Response

1. The design and positioning of drainage treatment areas (DTA) within the Scheme is proposed at optimal outfall locations following consultation with relevant landowners. DTAs have been designed to be integrated into the proposed landscaping, minimising impacts. The DTAs are located within the proposed highway boundary rather than being isolated beyond it, thus avoiding segregating or dividing agricultural land parcels



Agricultural land (drainage)

- i. Please explain how drainage during the construction phase, including for the construction compounds and haul roads will be managed to control surface water run-off and minimise the effect on adjacent agricultural land.
- ii. How will this be secured as part of the DCO?

- i. Please explain how drainage during the construction phase, including for the construction compounds and haul roads will be managed to control surface water run-off and minimise the effect on adjacent agricultural land.
- 1. In response to (i), the Construction Environmental Management Plan (CEMP) will be developed by the Contractor, including the contents of the Water Management Plan which includes mitigation in relation to pollution control and control of surface waters during construction, and which will ensure that these elements are managed so as to minimise the effects on adjacent agricultural land.
- ii. How will this be secured as part of the DCO?
- 2. In response to (ii), this will be secured through the obligations defined within the Outline Environmental Management Plan (OEMP) [APP-187], Table 3.2b: REAC tables for the main works, MW-WAT1. The OEMP itself is secured through paragraph 4 of Schedule 2 to the draft DCO [APP-020].



Agricultural land (drainage)

- i. Please explain how any affected field drainage will be reinstated post construction phase.
- ii. How will this be secured as part of the DCO?

- Field drainage systems and overland flows from catchments adjacent to the highway boundary would be intercepted and picked up by the Scheme's drainage proposals. The approach to land drainage is set out in paragraphs 3.2.9 to 3.2.13 and 5.27 to 5.29 of the Road Drainage Strategy, ES Appendix 11.3 [APP-281]. There would be no adverse impacts on land drainage as a result of the Scheme – the assessment of effects is set out in ES Chapter 11, Road Drainage and Water Environment [APP-049].
- 2. The new land drainage systems, which are completely independent of the road drainage systems, will take the form of ditches or filter drains. These land drainage systems will divert the overland or piped flows from the fields to either a watercourse or a location suitable for infiltration.
- 3. The detailed design of the land drainage systems will be in accordance with the Design Manual for Roads and Bridges (DMRB) Volume 4, Section 2, HA 106 Drainage of Runoff from Natural Catchments.
- 4. Requirement 10 in paragraph 10 of Schedule 2 to the draft Development Consent Order (DCO) [APP-020] stipulates that written details of the drainage system for each part of the Scheme must be approved by the Secretary of State, and that these details must be based on the mitigation measures included in the Environmental Statement (ES). The Road Drainage Strategy [APP-281] is appended to the ES (as Appendix 11.3) and as such, the drainage system to be submitted for approval must be based on the mitigation measures included within it.



Agricultural land (liaison)

A number of RRs, including the National Farmers' Union [RR-2252], raise concerns about the liaison with landowners, tenants (and their agents). The OEMP [APP-187], at page 14, identifies that a Community Liaison Manager will be appointed and this role would include responding to land owner concerns as well as any concerns raised by the wider community.

How will you ensure that the specific, and potentially specialist, requirements of the local agricultural community will be adequately managed?

- Discussions are ongoing with landowners and their representatives regarding individual landowner requirements. Any agreements on these, and how they will be managed, will be defined within Position Statements.
- 2. An agricultural liaison function would be provided through the Community Relations Manager (CRM). During the construction phase, the CRM would liaise with affected landowners to respond to concerns relating to the works, as outlined within Table 2.1 of the Outline Environmental Management Plan (OEMP) [APP-187]. This would include any specific, and potentially specialist, requirements identified by the local agricultural community. The CRM would be responsible for ensuring that that the Scheme's Environmental Manager and Project Manager are aware of any concerns and specific or specialist requirements relating to agriculture or landowners affected by the Scheme. The Contractor's Roles and Responsibilities are secured through Table 2.1 of the OEMP [APP-187]. Compliance with the OEMP is secured through paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020].
- 3. Provision for liaison regarding agricultural accommodation works / access routes, maintenance of livestock water supplies, fencing requirements and the restoration / monitoring of agricultural land is identified within items MW-COM1 and MW-COM3 to MW-COM5 of the OEMP [APP-187]. Compliance with the OEMP is secured through paragraph 4 of Schedule 2 to the draft Development Consent Order [APP-020].
- 4. Where required, in its role as 'The Authority' (see paragraph 1.1.10(a) of the OEMP) [APP-187], the Applicant would liaise with landowners, alongside the CRM. This would provide a separate person(s) from the Contractor to ensure that landowner concerns are being adequately managed.
- 5. Discussions regarding the role of the CRM are currently ongoing with the National Farmers Union (NFU) through the Statements of Common Ground (SoCG) process refer to item 4.17 within the NFU SoCG submitted at deadline two.



Agricultural land (land ownership and severance)

Please provide information, including annotated maps, showing the agricultural land interests within, and immediately adjoining, the proposed Order limits to include:

- i. land owned and tenanted by each affected agricultural business; and
- ii. highlight any areas where land would be severed by the Proposed Development.

Response

- 1. Annotated maps have been created and can be found in the appendix. The plans show any land within and/or adjoining the Order limits which is owned, leased, tenanted or occupied by an agricultural business affected by the Scheme. The title of each plan identifies the landowner or occupier and the relevant agricultural business to which the plan relates; in addition, the plan legend signifies the nature of the interest held by each party.
- 2. In terms of land which would be severed by the Scheme, if it were implemented, the Applicant's expectation, based on its discussions with landowners, is that the areas identified in the table below would be affected:

Land Owner	Plan reference
Guinness (Biddesden House Farm Partnership)	Guinness (Biddesden House Farm Partnership (A303-AMW-AG-804547- 20190418)
Turner (J & M Turner & Son)	Turner (J & M Turner & Son) A303- AMW-AG-804547-20190418
Pamela Sandell (Park Farm) and Philip Sawkill (West Amesbury Farm)	Pamela Margaret Sandell (Park Farm) A303-AMW-AG-809759-20190418
	and
	Philip Sawkill (West Amesbury Farm) A303-AMW-AG-809747-20190418

3. The Guinness family (Biddesden House Farm Partnership) have outlined concerns relating to plots 05-11 (19756 square metres, proposed to be subject to powers of temporary possession) and 05-18 (80372 square metres, proposed to be subject to the creation and acquisition of new rights); as is clear from the Land Plans [APP-005], these plots are not proposed to be acquired outright, but are surrounded by land which is proposed to be acquired for the purposes of the



- Scheme. Severance Discussions regarding the issue of severance are underway between the Guinness family's land agent and Highways England.
- 4. Highways England has engaged with the Turner family, who previously raised an issue with farm severance including plots 04-04, 04-23, 04-27 04-31, 04-21 5-07, 05-15, 14-01 and land that is outside the Order limits. The Turners requested the relocation of farm infrastructure. Highways England offered to support this as the Scheme developed. Further discussions with the Turner family suggest they no longer wish to pursue this proposal. Therefore, Highways England are now working with the Turner family to ensure appropriate mitigation is put in place to enable the Turner family to access all of their land during and post construction, and to reduce severance.
- 5. Pamela Sandell owns and Philip Sawkill farms plots 08-18 (required for permanent acquisition) and 08-21 (required for temporary possession). While Highways England proposes to provide access to 08-21 through the acquired plot 08-18, this access will not permit the passage of combine harvesters. As such the land would not be severed, but the Scheme would restrict the continuance of existing operations undertaken on the land. Highways England has discussed with the National Trust (land owners of the land to the north of plots 08-18 and 08-21) proposals to provide a separate access route for combine harvesters, to remove any element of severance once the scheme is complete. The National Trust has agreed in principle to the provision of this combine harvester access.



Agricultural land (water supplies)

A number of agricultural businesses (including those referred to in [RR-1606] [RR-1980] [RR-2180] [RR-2201] [RR-2088] [RR2134] [RR-2178] [RR-2220] [RR-2303]) are reliant in whole or part on private water supplies. Notwithstanding the information provided in the OEMP [APP-187], please provide clarity on the following:

- i. What measures would be put in place to ensure that private water supplies for agricultural businesses are not adversely affected by the Proposed Development?
- ii. What measures would be put in place to monitor any effects during the construction phase?
- iii. What measures would be put in place to monitor any effects post construction?
- iv. How would any remedial action (such an alternative supply) be provided in the event that the private supplies are adversely affected, including through supply levels and contamination?

- i. What measures would be put in place to ensure that private water supplies for agricultural businesses are not adversely affected by the Proposed Development?
- 1. The Applicant notes that the groundwater risk assessment in the Environmental Statement (ES), Appendix 11.4 [APP-282] concludes that the effect of the Scheme on private water supplies would be negligible (Annex E Qualitative Risk Assessment).
- ii. What measures would be put in place to monitor any effects during the construction phase?
- iii. What measures would be put in place to monitor any effects post construction?
 - 2. Item MW-COM3 in the Outline Environmental Management Plan (OEMP) [APP-187] sets out that the contractor must liaise with landowners and agents to establish the measures to be implemented to main livestock water supplies during construction. This reflects the fact that each landowner will have specific circumstances that will need to be dealt with, and that as such, prescribing a scheme-wide approach to such matters would not be appropriate. The 'measures' referred to could also include the establishment of monitoring processes.
 - 3. At a Scheme-wide level, item MW-WAT10 requires a groundwater management plan to be developed in consultation with the Environment Agency (EA), which would specify ongoing groundwater monitoring during and post construction to



- assess whether the Scheme has an effect on groundwater levels and quality which may affect private water supplies.
- 4. Item MW-11 also sets out measures to protect abstraction boreholes, committing the contractor to develop them in consultation with the EA and licence holders; including commitments to a range of different types of monitoring.
- iv. How would any remedial action (such an alternative supply) be provided in the event that the private supplies are adversely affected, including through supply levels and contamination?
 - 5. Both items MW-10 and 11 explicitly refer to remedial actions being taken if groundwater or abstraction supplies are affected. The need for remedial actions would also be able to be developed as part of the consultation with landowners required by item MW-COM3



Agricultural land (effect on business operations)

- i. What consideration has been given to the effect on the health and wellbeing of animals housed or grazing close to the Proposed Development including through noise and dust?
- ii. What measures could be put in place to mitigate any impacts and how could this be secured through the DCO?

- 1. The effect of noise on the health and wellbeing of animals housed or grazing close to the Scheme has not been specifically addressed in the noise assessment as the assessment was carried out in accordance with DMRB Volume 11, Section 3, Part 7, which does not reference livestock as a potentially sensitive receptor. Furthermore, livestock are not protected species and the relevant land is not a protected habitat. However, the design, mitigation and enhancement measures detailed in section 9.8 of the ES Chapter 9 Noise and Vibration [APP-047] would minimise noise levels as far as practicable for livestock as well as other sensitive receptors close to the Scheme. Mitigation measures are secured through the Outline Environmental Management Plan (OEMP) [APP-187]. The OEMP is secured by Paragraph 4 of Schedule 2 to the draft DCO [APP-020].
- 2. Regarding research into the effects of noise on livestock, the report "High Speed 2 Limited, Phase 1, Noise Effects on Livestock (236118-57/R01), February 2017" is a useful source of information. That report included a literature review which included the following conclusions:
 - a. there is no strong evidence of long-term effects of environmental noise on health in cows and other livestock. This is partly due to an absence of studies but also an absence of effects;
 - cattle and horses have more sensitive hearing than humans but farms are noisy places because of farm machinery and livestock may habituate to noise unlike wild animals;
 - c. cattle, like other animals, will respond to acute noise exposure with "fright reactions" and acute physiological arousal including increased cortisol, but there is evidence that livestock adapt over time to exposure to noise;
 - d. exposure to noise may affect milk production but there may also be recovery from acute effects;
 - e. cows vary by breed in their sensitivity to noise;
 - f. research in pigs suggests some increased aggression in response to mechanical noise exposure.
- 3. The literature review was tailored to a certain extent to high speed train pass-bys which can result in high level noise "events", which by their nature are more



- intrusive and potentially more alarming than a relatively steady noise such as road traffic.
- 4. Construction of the Scheme would result in elevated noise levels at times, but generally the noise would be reasonably steady, with few high-level noise "events". Additionally, construction noise would be temporary at any particular location along the Scheme and there would be liaison between the contractor and land owners/tenants to avoid particularly sensitive issues arising (secured through MW-COM1 of the OEMP [APP-187]).
- 5. It is also clear that there have been livestock grazing alongside the existing A303 for many years (and alongside other trunk roads and motorways) and these would not have continued to be kept there had there been noise health issues arising with grazing livestock near operational roads. Likewise there are livestock grazing near military operations in the area that can be the source of short-term elevated noise levels.
- 6. With regard to dust there are no experimental data on maximum safe dust levels for livestock and good agricultural practice simply dictates that livestock are not housed in dusty conditions; and, livestock kept outside are usually able to move away from dusty conditions. Likewise, the legislation (The Welfare of Farmed Animals (England) Regulations 2007, HMSO, 1st October 2007) only refers to dust once and only with regard to housed livestock and buildings; the livestock welfare codes (Code of Recommendations for the Welfare of Livestock, DEFRA) make no additional reference.
- In practical terms dust emissions would be managed across the whole construction area and these measures are considered to be protective for livestock, designated ecosystems and public exposure. Dust mitigation measures, based on standard best practice, are secured through MW-AIR1 of the OEMP [APP-187].
- 8. Given the above, it is concluded that the design, mitigation and enhancement measures already secured are sufficient and no further specific measures are required to be put in place to mitigate impacts on livestock.



Agricultural land (effect on business operations)

Land to the east of Parsonage Down National Nature Reserve (NNR) is proposed to be used for the deposing of 500,000m3 of tunnel arisings. [RR-2240] and [RR-2252] indicate that this would represent around 21% of the total arable area for the affected agricultural business.

- i. Beyond that set out in [APP-294], what consideration has been given to the economic and other implications of this for the affected business?
- ii. Please detail the Applicant's balance of considerations in terms of the benefits that may be associated with not removing the arisings for off-site disposal and the negative effect that is likely to arise for this agricultural business.
- iii. What consideration was given to the use of alternative sites close to the proposed road alignment?
- iv. What proposals could be put in place to mitigate the effects on the relevant agricultural operations?

- i. Beyond that set out in [APP-294], what consideration has been given to the economic and other implications of this for the affected business?
- 1. In response to point (i), the figures presented in [RR-2240] and [RR-2252] stating that 21% of the total arable area of the affected business (Manor Farm, Stapleford) would be required do not refer solely to the land required for deposition of the 500,000 m3 of tunnel arisings. The 21% figure includes arable land required for three elements of the Scheme:
 - a. land required for the construction of the highway itself and for structural embankments 15 ha
 - b. land required to mitigate the visual impact of the carriageway and embankment slope (essential landscape mitigation, using 400,000 m3 of tunnel arisings) 12.9 ha
 - c. land required for the further deposition of the tunnel arisings (using the remaining 500,000 m3 of tunnel arisings) 28.2 ha.
- It is acknowledged that Manor Farm, Stapleford would be significantly affected by the construction of the Scheme and would be entitled to compensation under statutory provision. This is acknowledged in Table 13.23 (Summary of permanent effects on agricultural holdings) of the Environmental Statement, Chapter 13, People and Communities [APP-051].
- 3. In the absence of depositing the additional 500,000 m3 of tunnel arisings east of Parsonage Down, the area of land required from Manor Farm, Stapleford would



be 27.9 ha and this represents 8.3% of the holding. The inclusion of the deposition of the additional 500,000 m3 of tunnel arisings east of Parsonage Down would require an additional 8.4% of the arable area of the affected holding, bringing the total area of land required from Manor Farm, Stapleford to 56.1ha which represents 16.7% of the (337ha) holding.

- ii. Please detail the Applicant's balance of considerations in terms of the benefits that may be associated with not removing the arisings for off-site disposal and the negative effect that is likely to arise for this agricultural business.
- 4. In response to point (ii), Table 3-3 of the Tunnel Arisings Management Strategy [APP-285] presents the results of an assessment of the options of either transporting tunnel arisings away from the site for off-site disposal, compared to deposition on agricultural land close to the proposed road alignment.
- 5. Table 3-3 considers the negative effects of loss of agricultural land, but since the assessment focuses on the principles of on-site versus off-site management, the economic effects on specific agricultural businesses are not considered at this stage of the assessment.
- 6. The benefits of not removing the tunnel arisings for off-site disposal, as set out in [APP-285] are:
 - Avoidance of air quality, noise and traffic impacts on sensitive receptors along the route to off-site disposal locations;
 - Reduction in greenhouse gas emissions by reducing transportation of tunnel arisings;
 - Avoidance of the need to use waste management capacity within the region;
 - Potential for creating habitats of conservation value if tunnel arisings are used on-site; and
 - Improved operational control, by avoiding the need to rely on third-party facilities remote from the Scheme.
- 7. The adverse effects of not removing the tunnel arisings for off-site disposal are primarily the loss of approximately 8.4% of the arable land currently farmed by Manor Farm, Stapleford and the economic impacts this may have on the agricultural business.
- 8. Having regard to the many public benefits described above, set against the private loss to Manor Farm Stapleford, the Applicant concluded that the benefits outweigh the adverse effects, and hence on-site disposal is the preferred option. Table 3-3 of [APP-285] sets out the criteria used in making this decision and demonstrates that on-site deposition of tunnel arisings is preferred for a majority of these criteria.



iii. What consideration was given to the use of alternative sites close to the proposed road alignment?

- 9. In response to point (iii), following identification of on-site placement of tunnel arisings as the preferred option, a number of potential alternative sites were then considered close to the proposed road alignment. Table 4.5 of [APP-285] sets out the:
 - methodology for identifying potential alternative sites close to the proposed road alignment;
 - criteria for assessing these sites; and
 - results of the assessment.
- 10. The assessment concluded that the only other location which would be potentially feasible for placement of tunnel arisings would be the land to the south of Parsonage Down (identified as site 6 in Table 4-5 of [APP-285]). A comparative assessment of the two sites confirmed that the overall effects of using the site east of Parsonage Down would be lower than of using the site south of Parsonage Down, due in large part to the fact that deposition of tunnel arisings to the east of Parsonage Down would be necessary for essential landscape mitigation. The deposition of the remaining tunnel arisings in this location would, on balance, be preferable to using the site south of Parsonage Down, that would otherwise be unaffected.
- 11. The Applicant recognises that the site east of Parsonage Down represents a higher proportion of the affected business than is the case for the site south of Parsonage Down. However, the Applicant considers that, because the site east of Parsonage Down would already be subject to disturbance due to essential landscape mitigation, and because of the better ecological net benefits that would result following restoration to chalk grassland, use of the site east of Parsonage Down for depositing tunnel arisings is the preferred option.

iv. What proposals could be put in place to mitigate the effects on the relevant agricultural operations?

12. In response to point (iv), the Applicant proposes compulsory acquisition of the affected arable land in order to mitigate the effects on the business – for instance, if Mr Moore wished not to retain his land in its changed state, the Applicant would have the ability to acquire it from him. However, the compulsory acquisition powers in the DCO are drafted to permit a flexible approach, whereby the Applicant could exercise a lesser power than outright compulsory acquisition of all interests in Mr Moore's land, should an alternative solution be agreed between the parties.



Agricultural land (effect on business operations)

With refence to [RR-2108] please provide a justification for the extent of the proposed Order limits close to Foredown House.

- 1. The land required for the Scheme close to Foredown House, Winterbourne Stoke is plot 04-04, which is proposed to be subject to powers of temporary possession.
- 2. Highways England has included this land in the DCO application to ensure that delivery of the Scheme will be possible. At this stage, Highways England anticipates that the land will be needed for the reasons set out in the Statement of Reasons, in Table 4 of Annex A (see reference to plot 04-04) [APP-023] which, in the main, relate to the provision of working space during construction. If, once a contractor has been appointed and the detailed design and construction programme have been progressed, it turns out that not all of the land in plot 04-04 is required to be used (temporarily) for the construction of the Scheme, then Highways England would not use all of the land within that plot in particular the land closest to Foredown House itself.



Agricultural land (effect on business operations)

The development would involve the provision of landscape reprofiling and the creation of permanent chalk grassland.

Once these have been created, what, if any, ongoing maintenance requirements or restrictions on agricultural use would be necessary and how would this be secured with the landowners?

- The chalk grassland created in areas acquired permanently for the scheme would be retained by Highways England and managed to develop and maintain herbrich calcareous grassland. Areas of chalk grassland suitable for management by grazing would be stock-fenced, with access for stock and facilities for stockwatering.
- 2. The maintenance authority would be responsible for arranging for grazing or mowing with one or more providers, which could be local landowners as tenants, by agreement.
- 3. To deliver the outcomes for biodiversity and landscape the chalk grassland is dependent on low fertility soil. Low fertility avoids dominance by vigorous grass species and the associated reduction or loss of low-growing herb species and associated species. There would be restrictions on the use of fertilizers, with no use of artificial fertilizer and likely to be no use of manure. To avoid bringing additional nutrients onto the chalk grassland stock-feeding would not be allowed, other than mineral licks to aid digestion. This would limit the periods of availability of grazing, which is likely to be for short periods annually and not necessarily every year, depending on the condition of the grassland. The grazing required would certainly not be compatible with intensive livestock production.
 Management requirements would be similar to those for chalk grassland SSSIs.
- 4. Grazing would be excluded from the drainage infiltration basins until the sward had recovered after maintenance to replace infiltration material. After refurbishment of infiltration basins, or if other conditions meant the area was not suitable for grazing, management would be by mowing as appropriate.
- 5. The Outline Environmental Management Plan (OEMP) [APP-187], at Item MW-BIO13, provides that the results of monitoring will be used to inform the management of chalk grassland, which may involve changes in the frequency, extent and duration of grazing and mowing, such that any ongoing arrangements with landowners or tenants would need to remain subject to review. The OEPM is secured by Requirement 4 in Schedule 2 to the draft DCO [APP-020].



Agricultural land (effect on business operations)

Work No.9 includes the extension of two existing substations and related electricity cabling for the provision of power to the development.

- i. Please clarify whether it is envisioned that an extension to only one, or both of these substations would be required.
- ii. Please confirm whether any cabling, beyond the limits of deviation, would be required to link to the development, and if so set out the likely route and effect on agricultural land.
- iii. Please confirm what consideration has been given to conflict with existing services if additional cabling is provided beneath the road (Land Plan Plots 09-38, 09-48, 10-02).

- i. Please clarify whether it is envisioned that an extension to only one, or both of these substations would be required.
- 1. In response to (i), since the DCO application was submitted, Scottish and Southern Energy plc (SSE) has indicated there is a possibility that only the southern Ratfyn substation would be required for the A303 works. Therefore, it is possible that works will not be required in plots: 09-30, 09-31, 09-36, 09-37, 09-38 and 09-40 (as shown on Sheet 9 of the Land Plans [APP-005]). SSE has also indicated that all necessary works at the southern Ratfyn substation may potentially be carried out within the current substation footprint.
- ii. Please confirm whether any cabling, beyond the limits of deviation, would be required to link to the development, and if so set out the likely route and effect on agricultural land.
 - 2. In response to (ii), the cabling would route from Ratfyn Substation south along plots 09-41 and 9-45 to join the existing A303 within plot 09-42 all within the Order limits. This cable route would have no effect on agricultural land.
- iii. Please confirm what consideration has been given to conflict with existing services if additional cabling is provided beneath the road (Land Plan Plots 09-38, 09-48, 10-02).
 - 3. In response to (iii), existing services have been identified beneath the road; the precise location of these services remains to be determined in advance of the detailed design by SSE of the additional cable route. The Protective Provisions set out in Schedule 11 of the draft Development Consent Order will ensure appropriate protection for relevant statutory undertakers. The response to question DCO.1.52 sets out the status of the Protective Provisions negotiations with the statutory undertakers.



Agricultural land (effect on business operations)

Concerns have been raised in RR-1594 that the extension of one of the substations would result in the loss of an existing chemical store and wash down facility for serving the holding operated by P J Rowland & Sons (Farmers) Limited.

Can the applicant clarify the proposal for the extension of the substation and the likely effect on these facilities?

Response

Since the DCO application was submitted, Scottish and Southern Energy plc (SSE) has indicated there is a possibility that only the southern Ratfyn substation would be required for the A303 works. Therefore, it is possible that works will not be required in plots: 09-30, 09-31, 09-36, 09-37, 09-38 and 09-40 (as shown on Sheet 9 of the Land Plans [APP-005]). SSE has also indicated that all necessary works at the southern Ratfyn substation may potentially be carried out within the current substation footprint. This may remove the need for permanent land acquisition at plots 09-43 and 10-01, in which case there would be no effect on the facilities (serving the holding operated by P J Rowland & Sons (Farmers) Limited) which are understood to be located within plot 9-43. However, until the scope of the required works is confirmed by SSE it is necessary and appropriate for Highways England to continue to seek compulsory acquisition powers in respect of the above-mentioned land to safeguard the delivery of the Scheme.



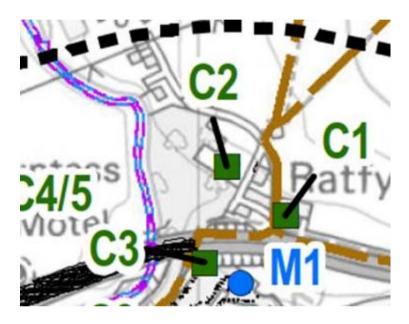
Agricultural land (effect on business operations)

Please provide further details setting out your concern in respect of increased light and noise pollution from Countess Roundabout on the tenanted land at Ratfyn Farm?

- 1. The potential impact of noise on the health and wellbeing of animals housed or grazing close to the Scheme is addressed in Written Questions Ag. 1.26. Although livestock are not referenced as a sensitive receptor in DMRB Volume 11, Section 3, Part 7, the design, mitigation and enhancement measures detailed in section 9.8 of the Environmental Statement Chapter 9 Noise and Vibration [APP-047] will minimise noise levels as far as practicable for livestock as well as other sensitive receptors close to the Scheme. Mitigation measures are primarily secured through the Outline Environmental Management Plan (OEMP) [APP-187]. Compliance with the OEMP is secured by Paragraph 4 of Schedule 2 of the draft DCO [APP-020].
- 2. The tenanted land at Ratfyn Farm is the centre of operations for a large arable business with diversified businesses operating in the farm buildings, including equestrian activities; there are no commercial agricultural livestock kept.
- 3. The likely impact of noise from the operation of the scheme as reported in Chapter 9 of the ES Noise and Vibration [APP-047] results in a negligible increase in traffic noise levels (<1 dB increase in LA10,18h in the short term) at Ratfyn Farm. This is illustrated in Figure 9.4 of the ES (APP-167]. This increase is due to the small increase in traffic on the A303 mainline with the scheme in operation. On this basis a significant operational traffic noise effect is not anticipated in this area.
- 4. Regarding construction, both Ratfyn Farm Bungalows (C1) and Ratfyn Farm (C2) are included as receptors in the assessment (see extract from Figure 9.1 of the ES [APP-164] below). Construction noise levels have been predicted over the duration of the works (see Table 9.14 of the ES [APP-047], the predictions include the operation of the satellite compound at Countess roundabout. Criteria for the onset of potentially significant construction noise effects are set in accordance with the relevant British Standard (BS 5228:2009 + A1:2014 'Code of Practice for noise and vibration control on construction and open sites'). At both locations, a significant construction noise effect is not anticipated at these properties.
- 5. The likely impact of lighting is not anticipated to be significant. As detailed in paragraphs 2.3.51 and 2.3.52 of the ES The Proposed Scheme [APP-040] the existing lighting system at Countess Roundabout would be replaced by a modern system that would reduce light spill and, although the provision of the new flyover



- would increase the elevation of vehicle headlights, this will be mitigated by the provision of noise barriers along the structure. Sections D-CH9, D-CH10, D-CH11 of the OEMP [APP-187] outline the lighting design for the operational phase of the Scheme, with D-CH-12 stating that "Existing lighting units at Countess Roundabout shall be replaced to minimise light spill."
- 6. Regarding construction, the contractor will design, position and direct temporary lighting to prevent unnecessary disturbance as secured in item MW-G29 of the OEMP [APP-187] which is secured by paragraph 4 of Schedule 2 of the draft DCO.



Extract from Figure 9.1 of the ES [APP-164]



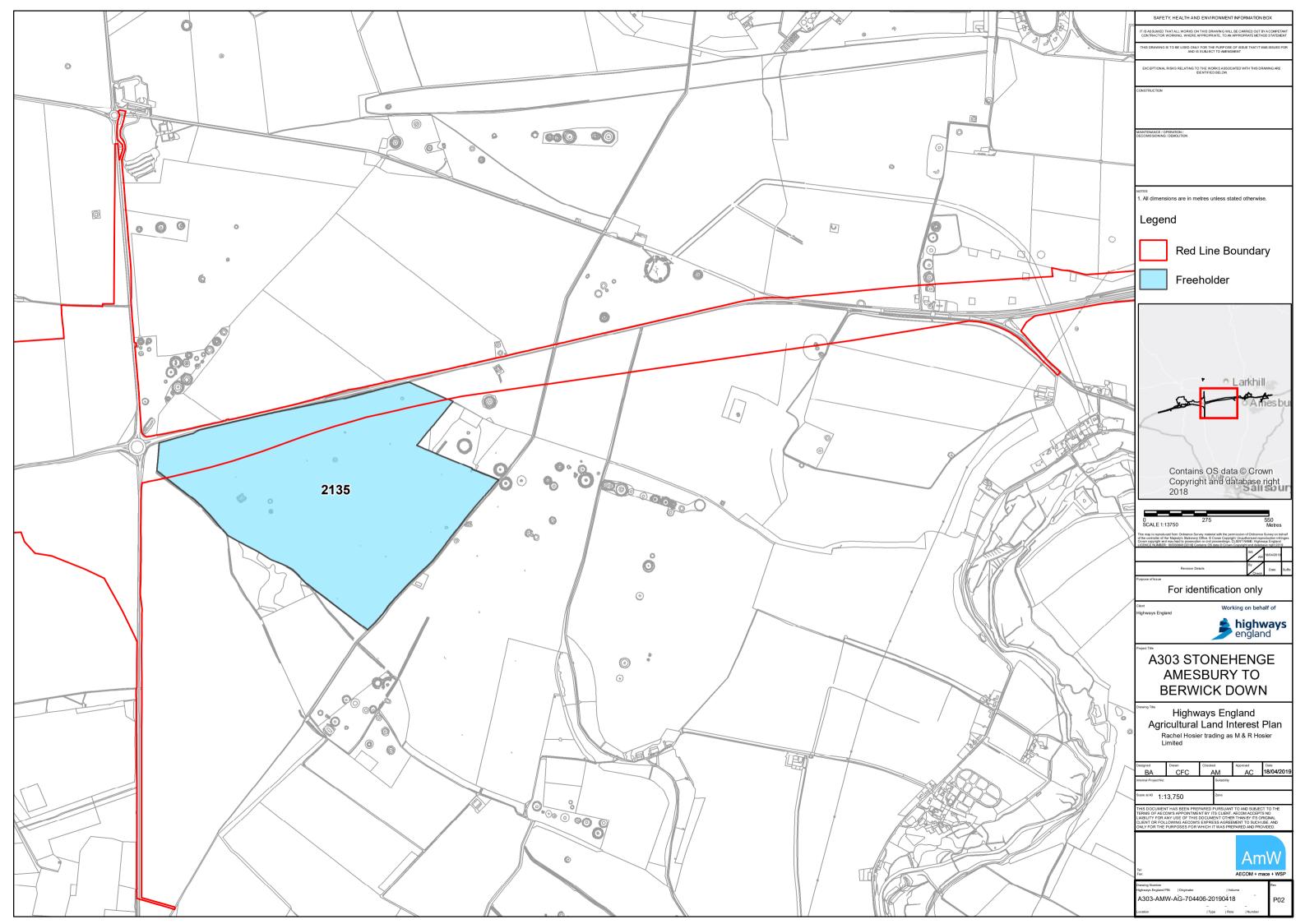
Appendices Ag.1

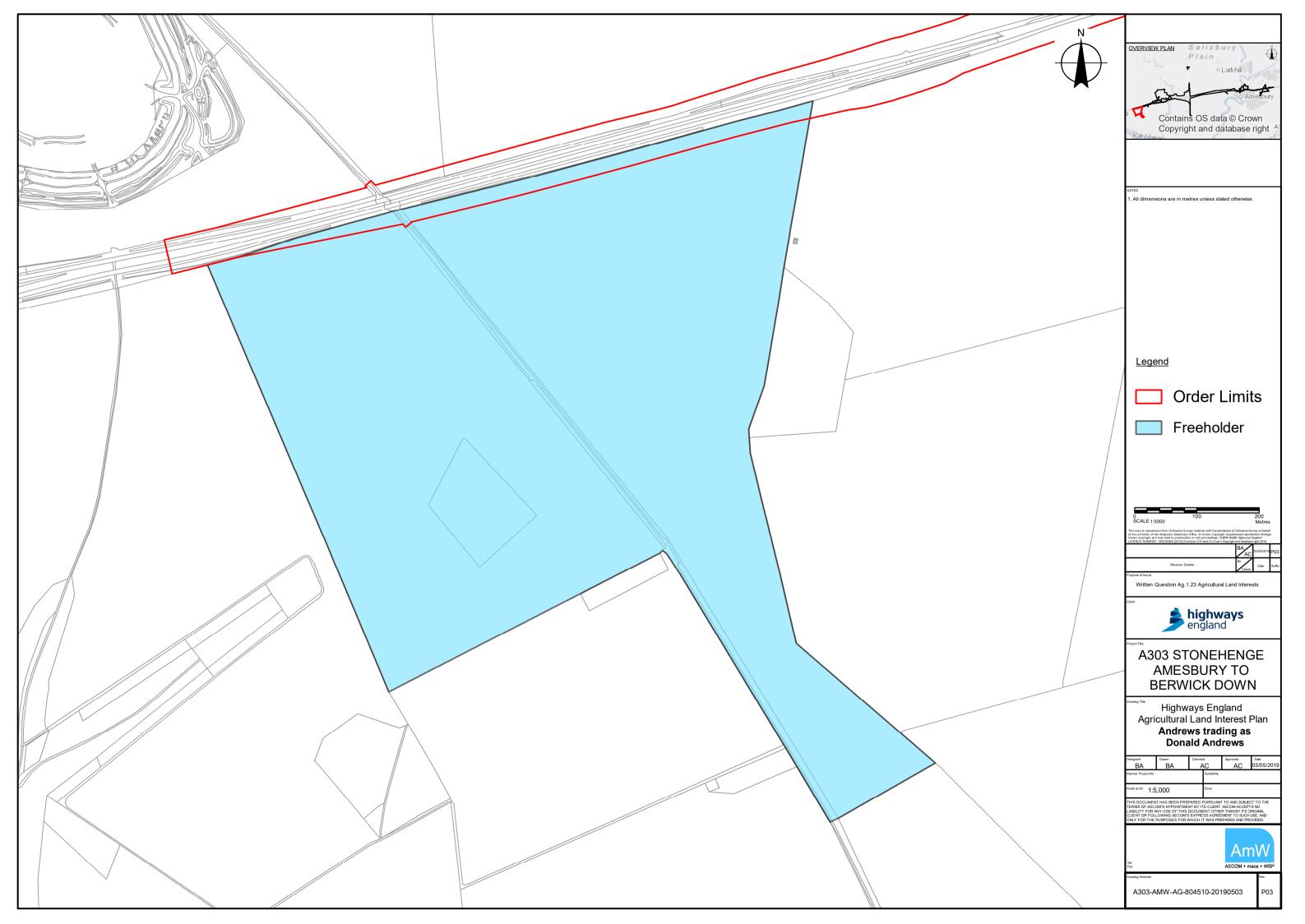


Appendices Ag.1

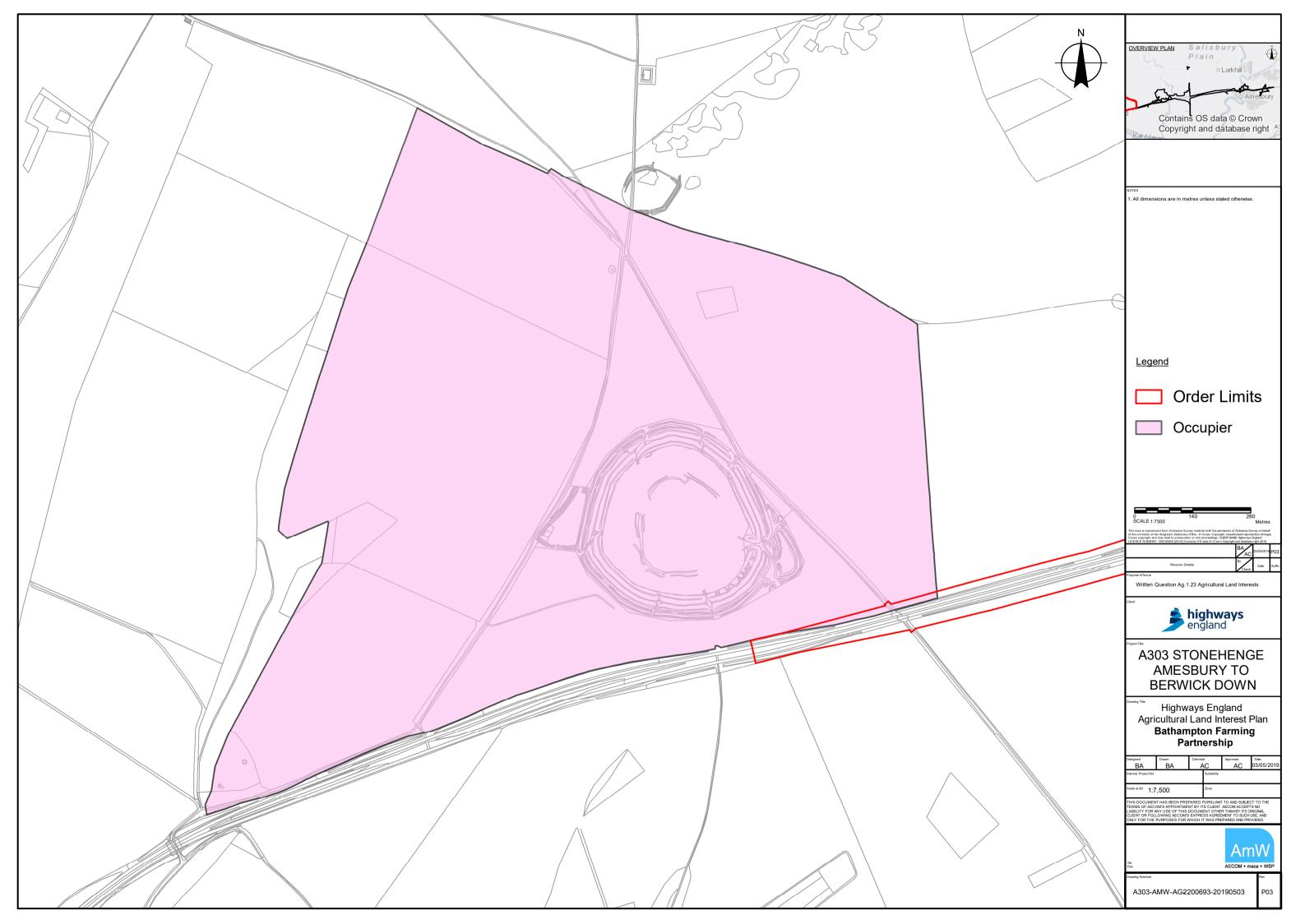
Question Ag.1.23

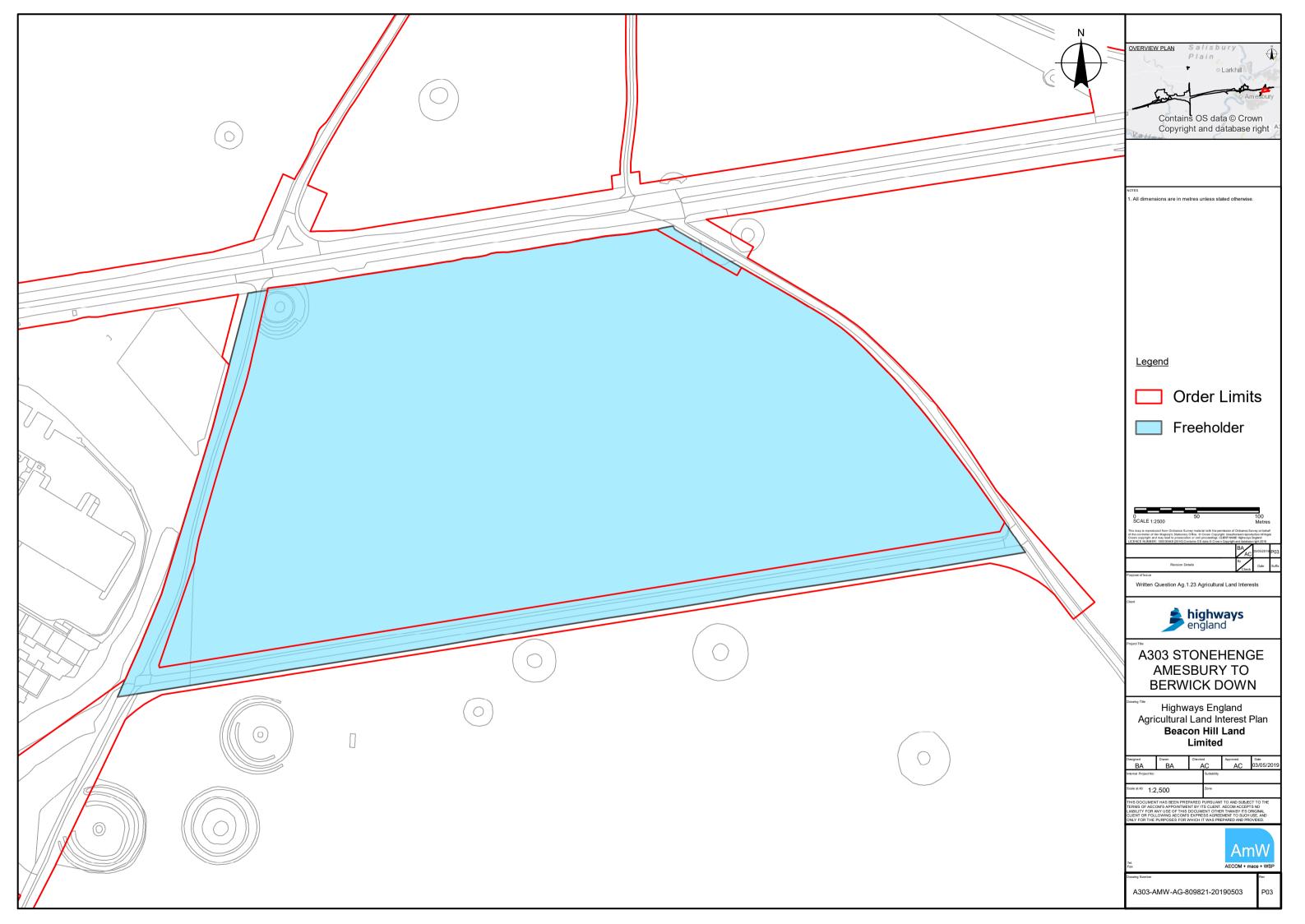
Agricultural Land Interest Plans

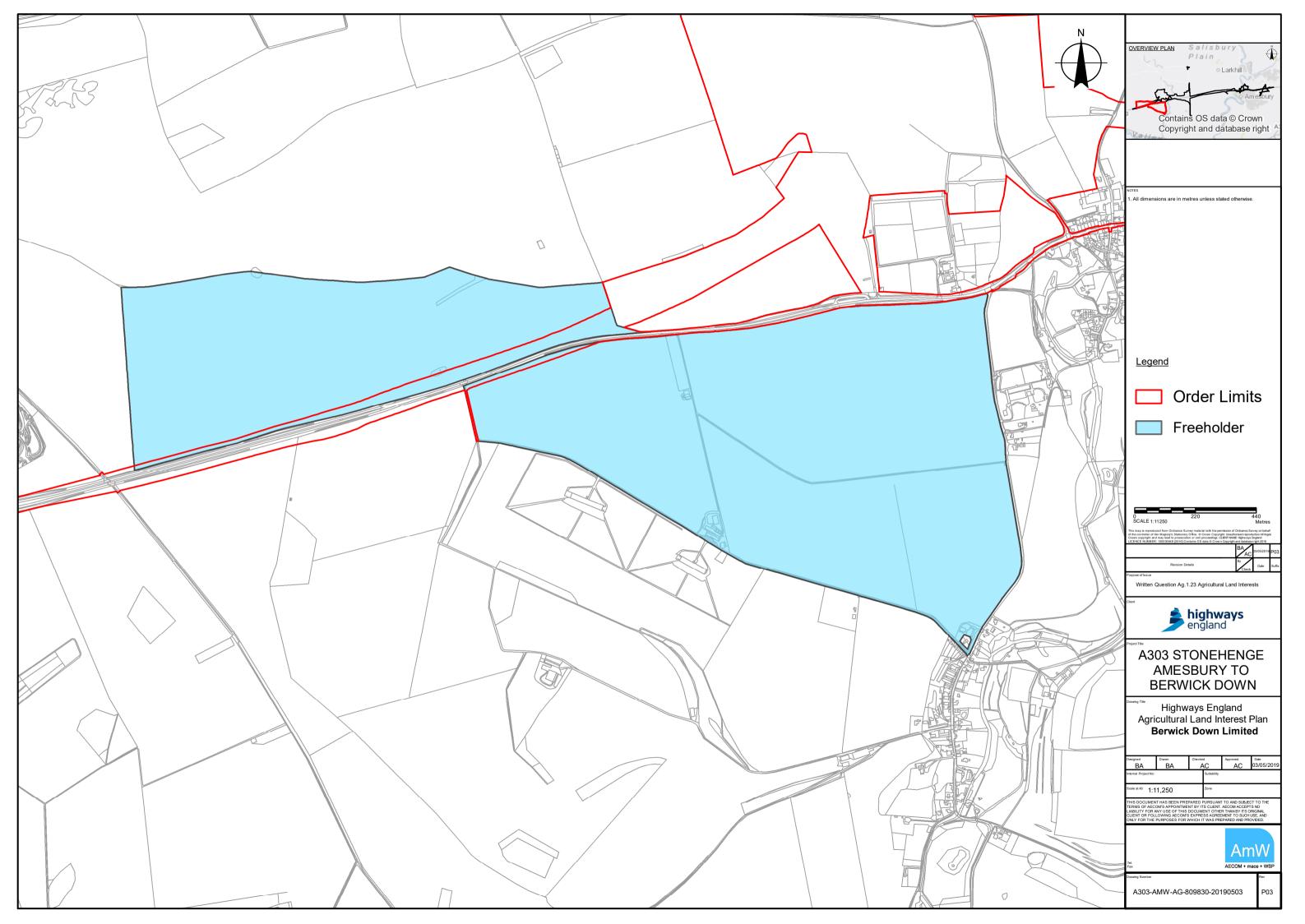


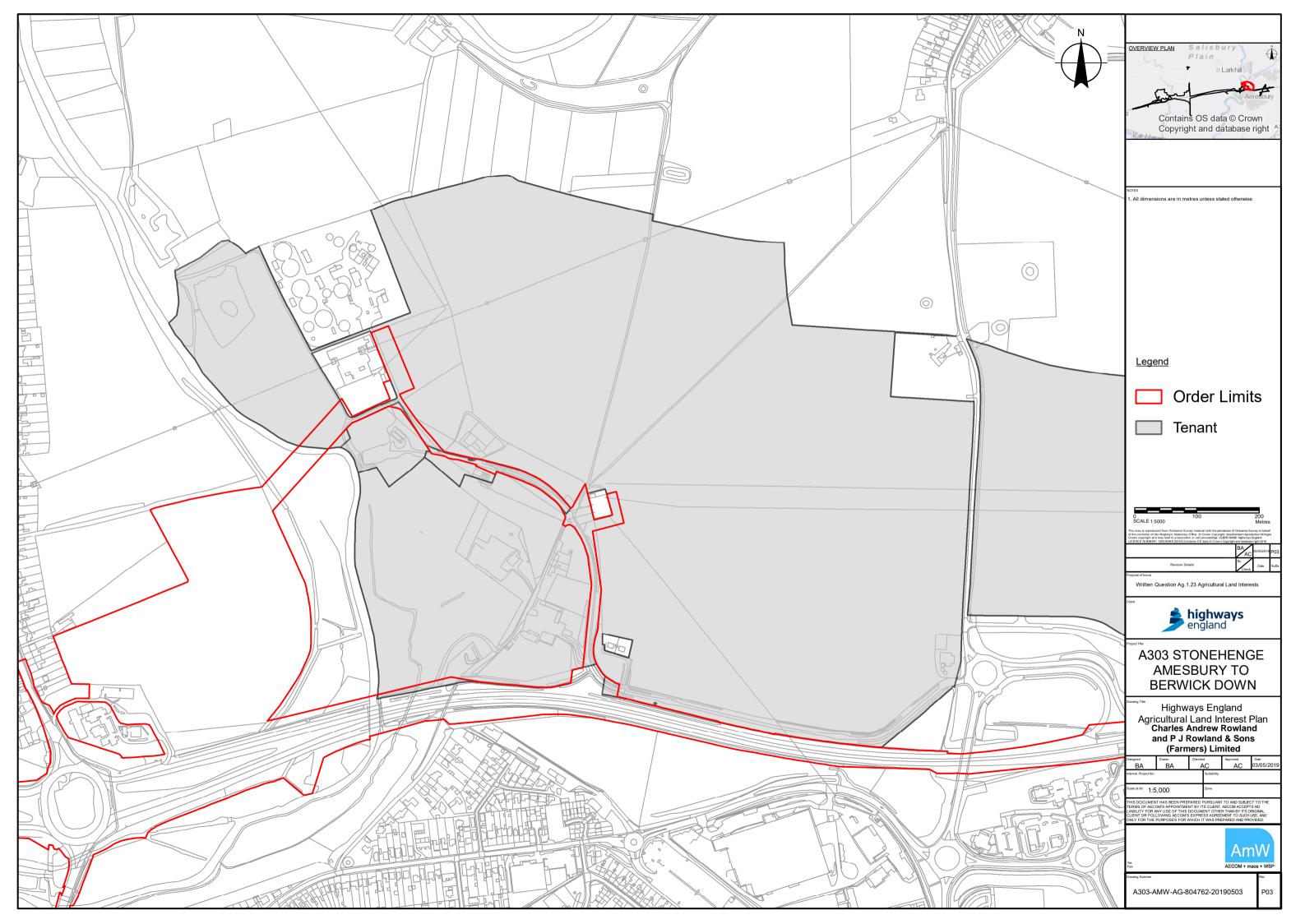


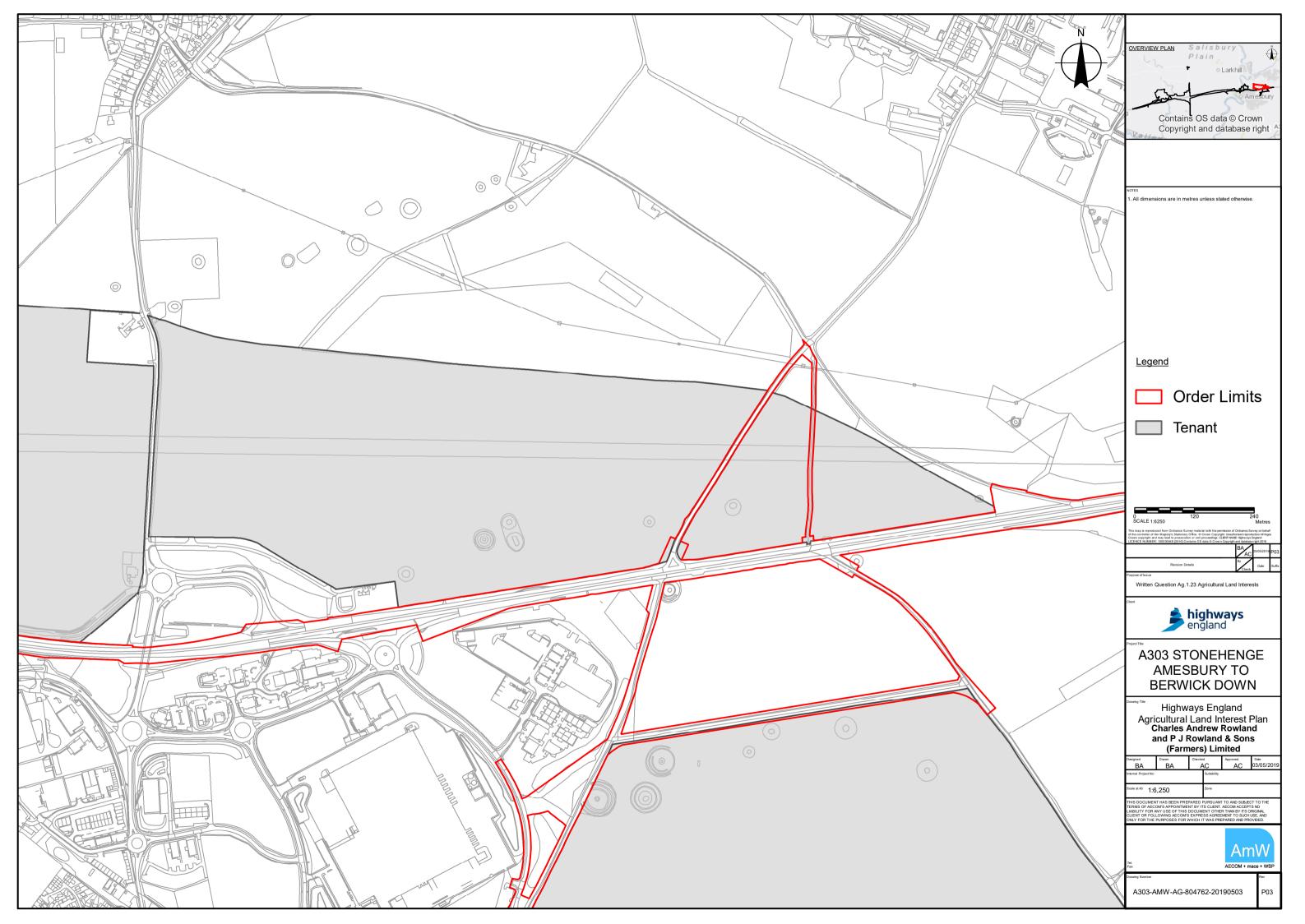


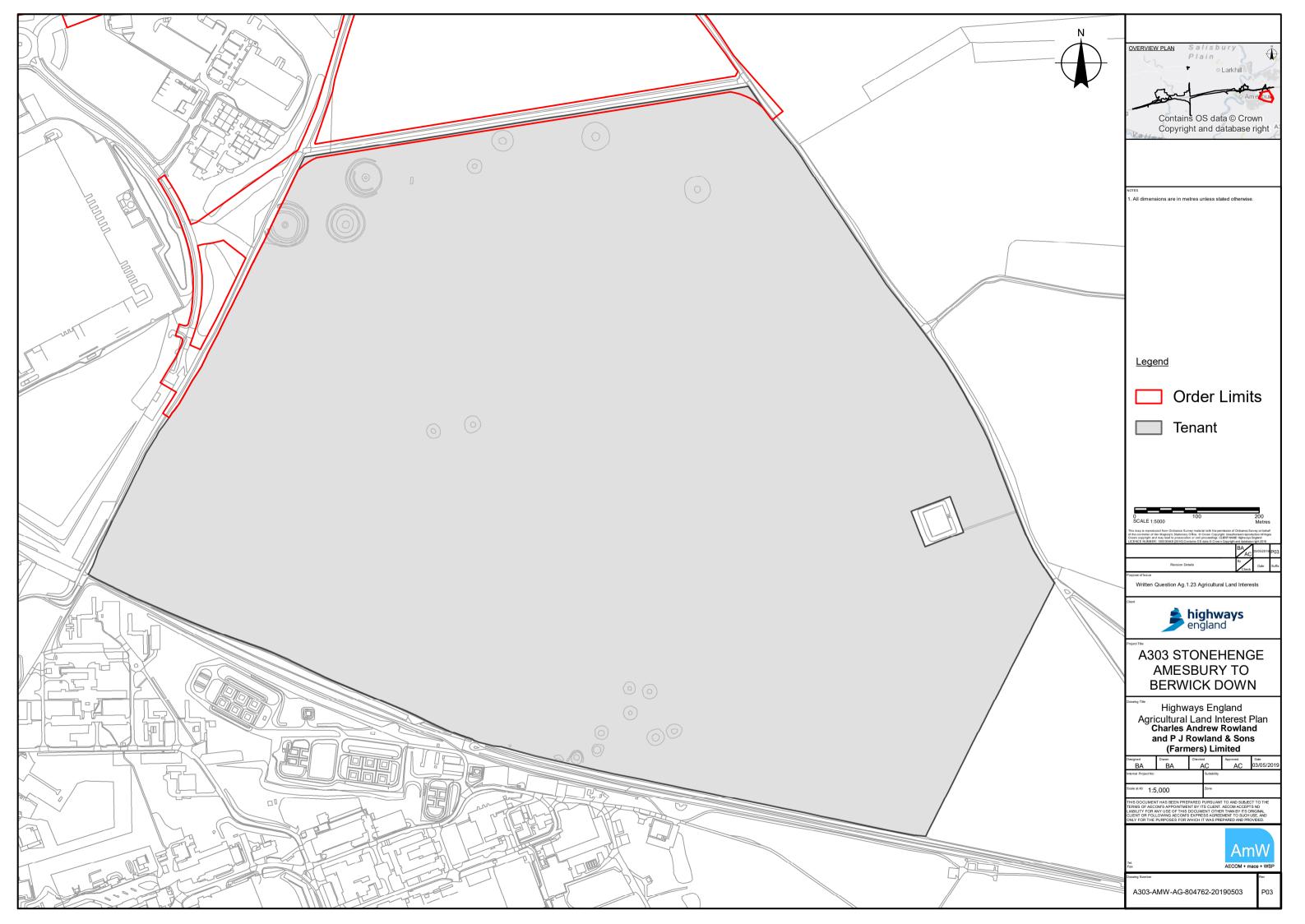


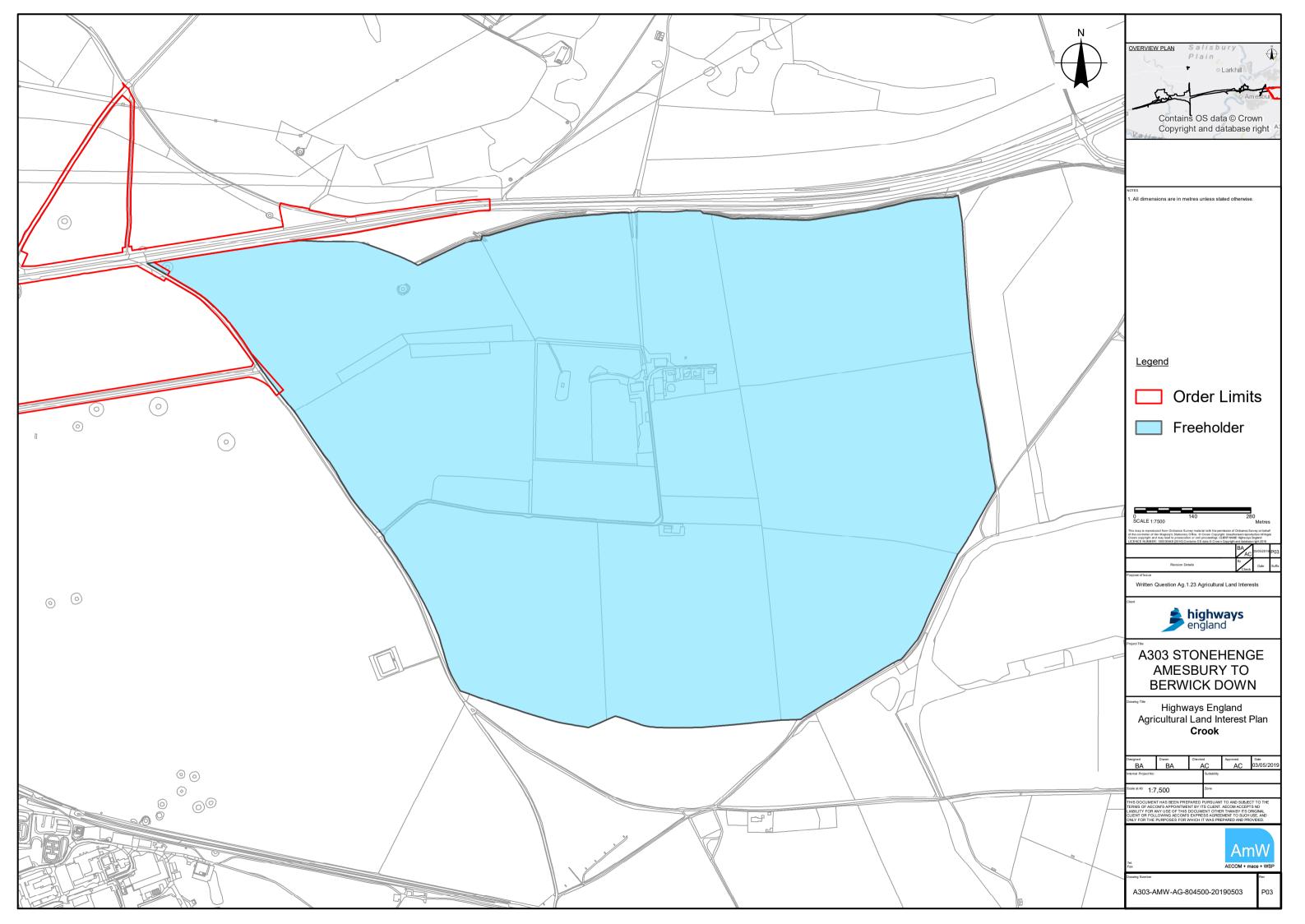


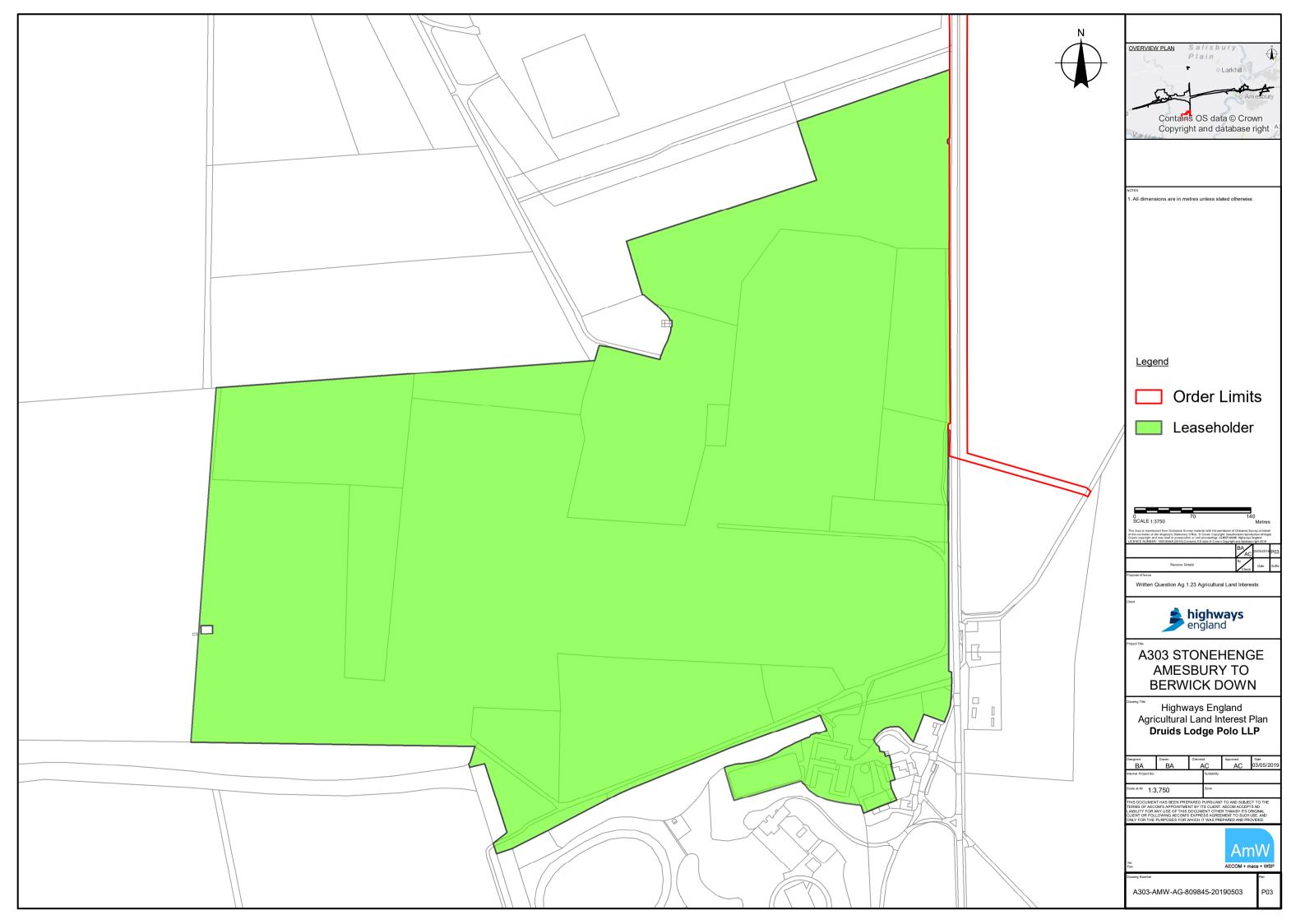




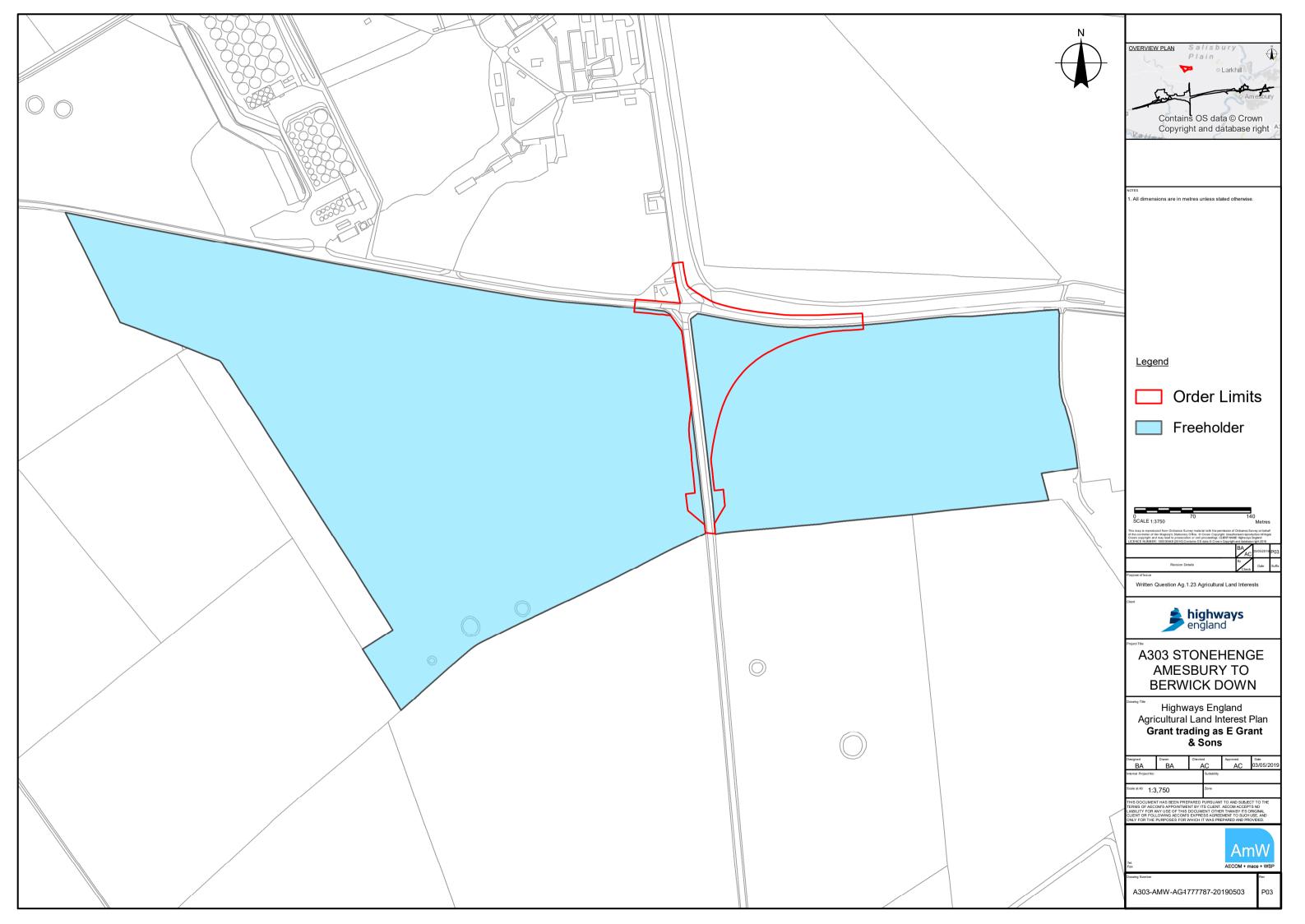


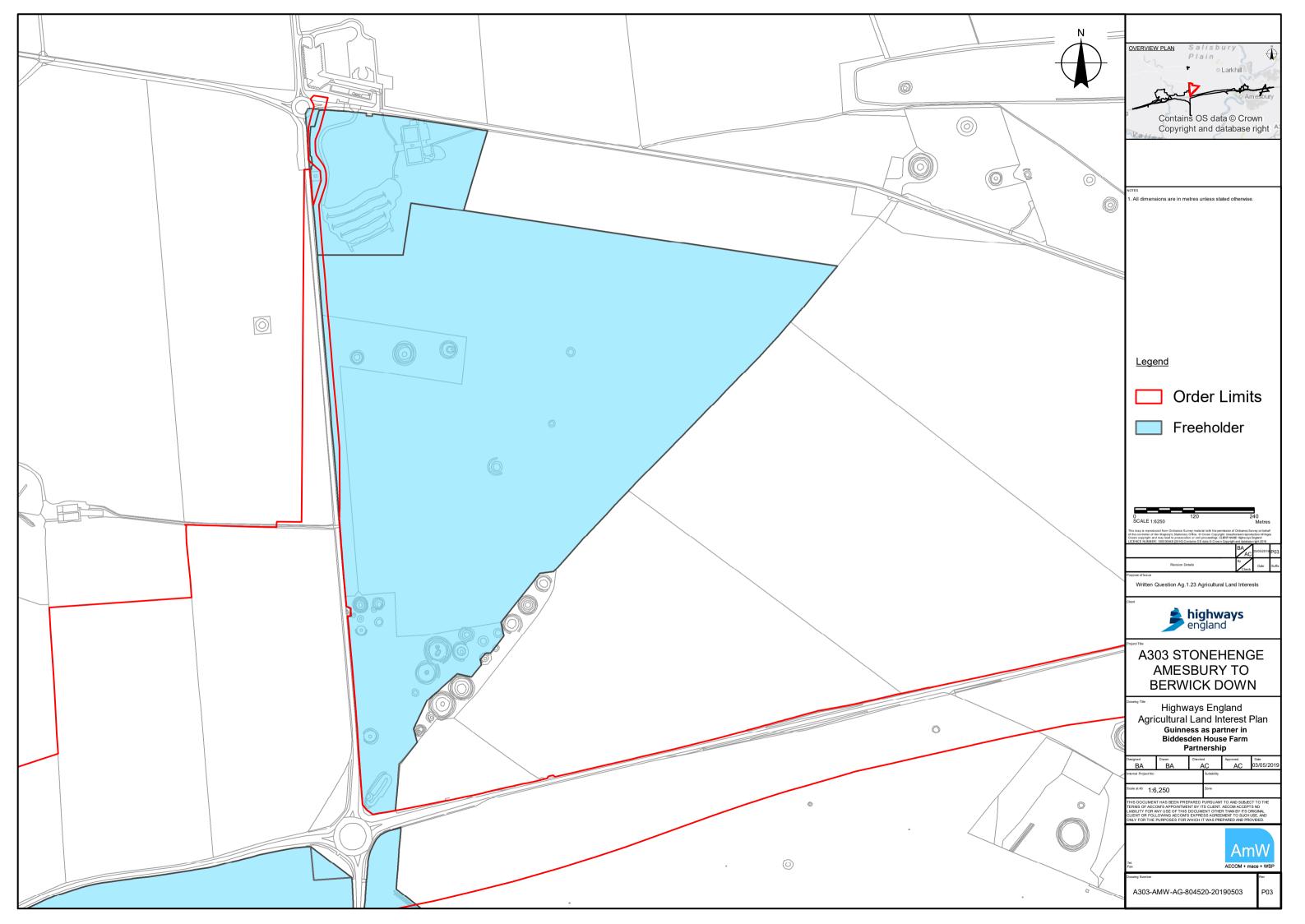


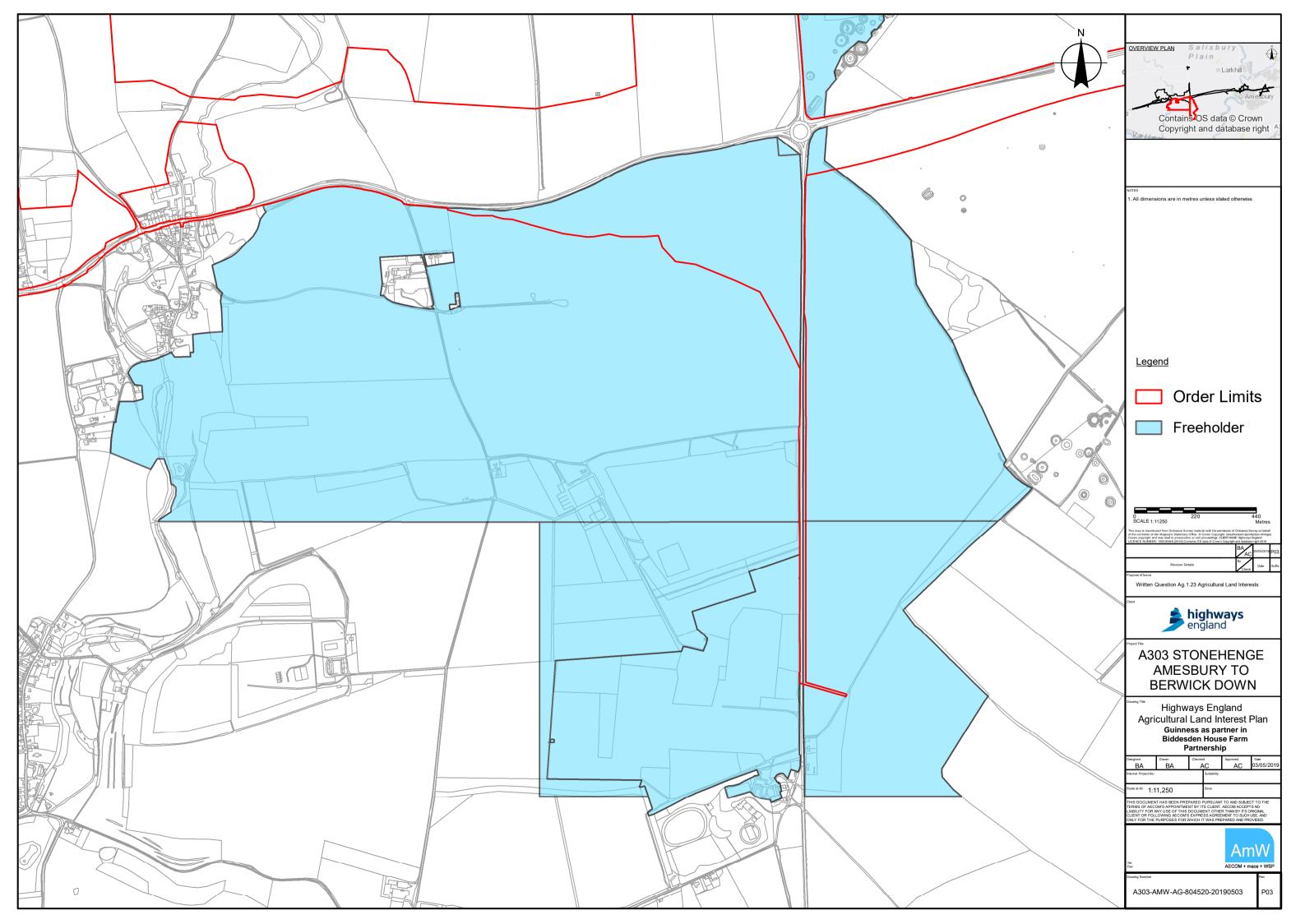


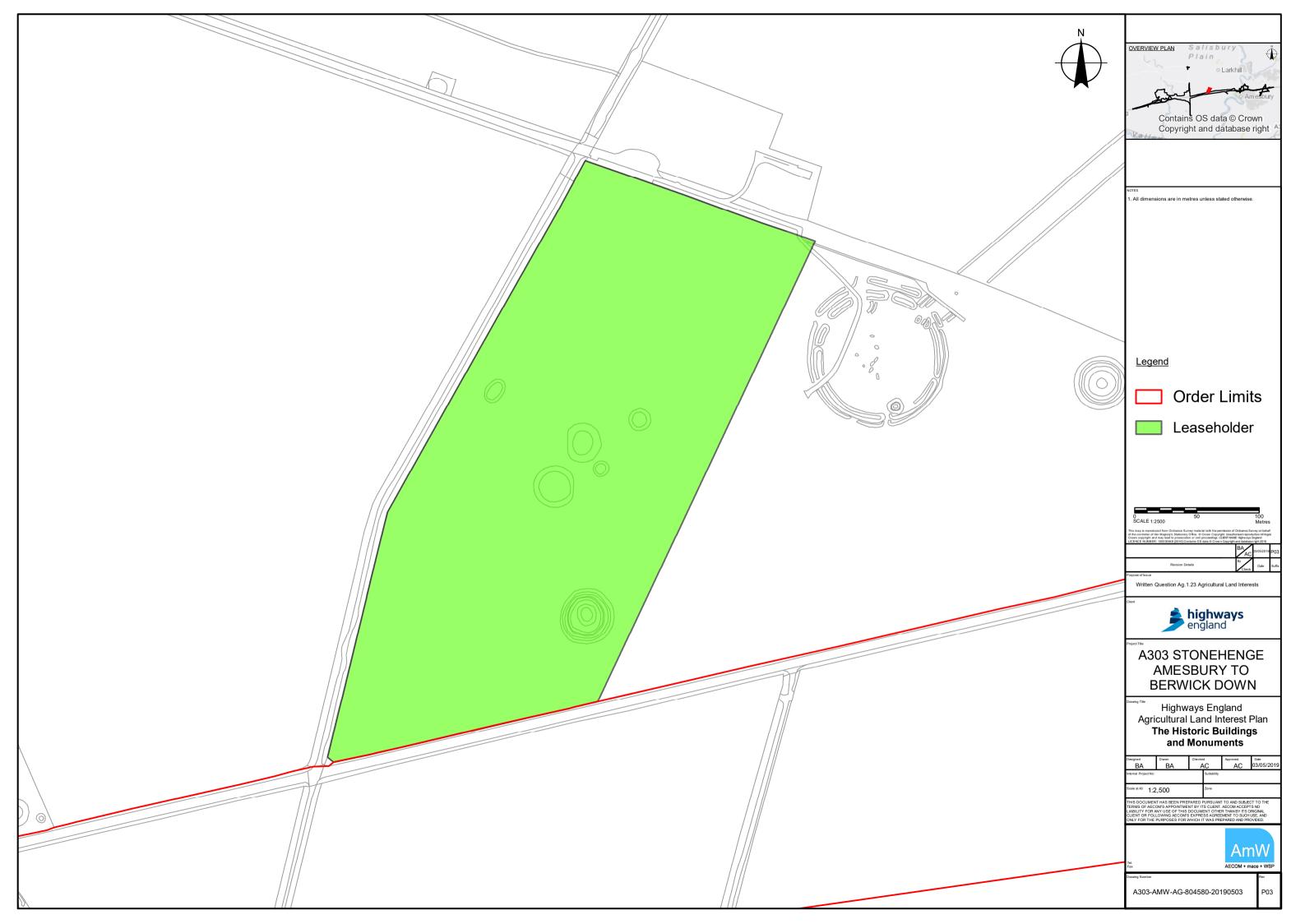


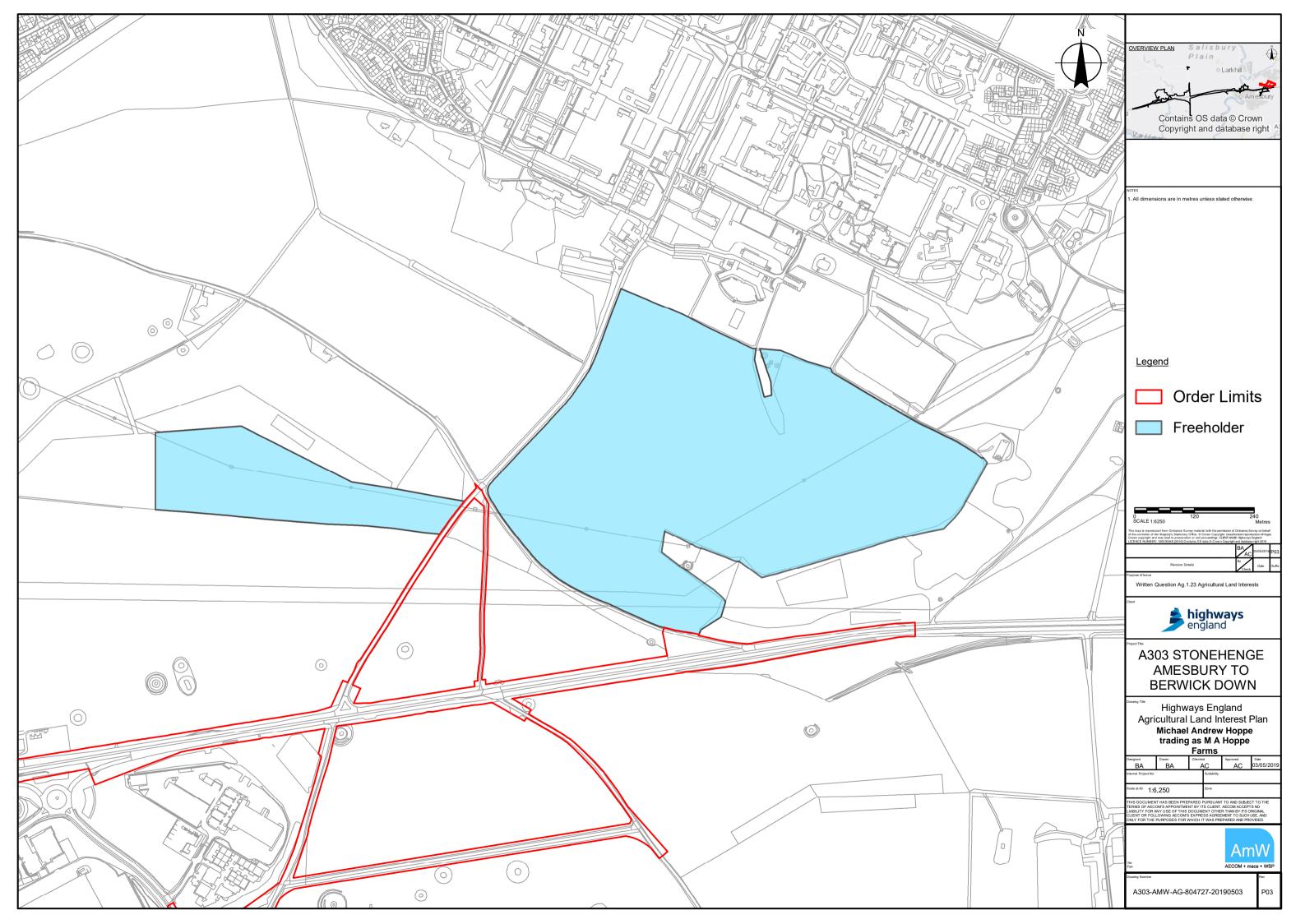


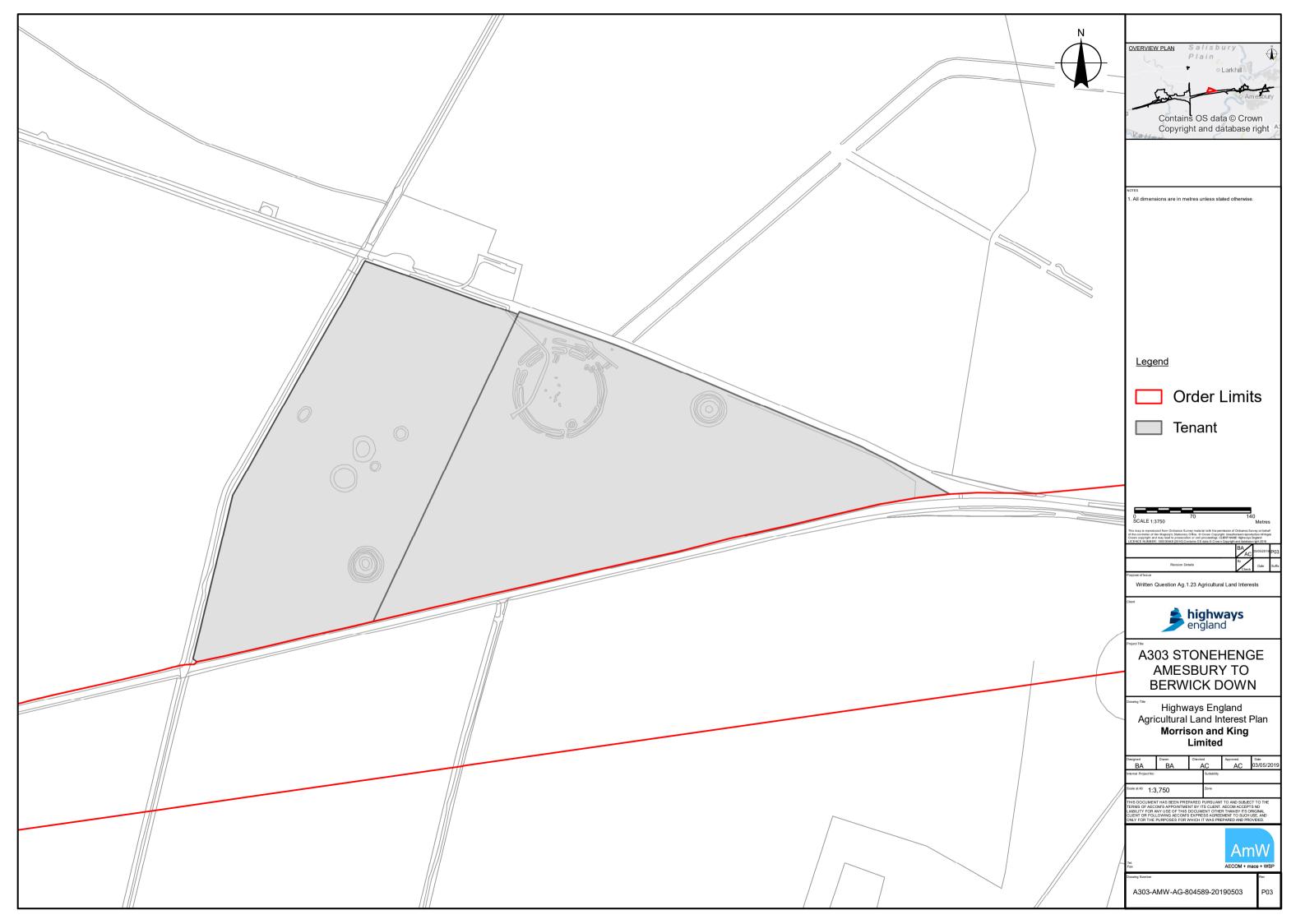


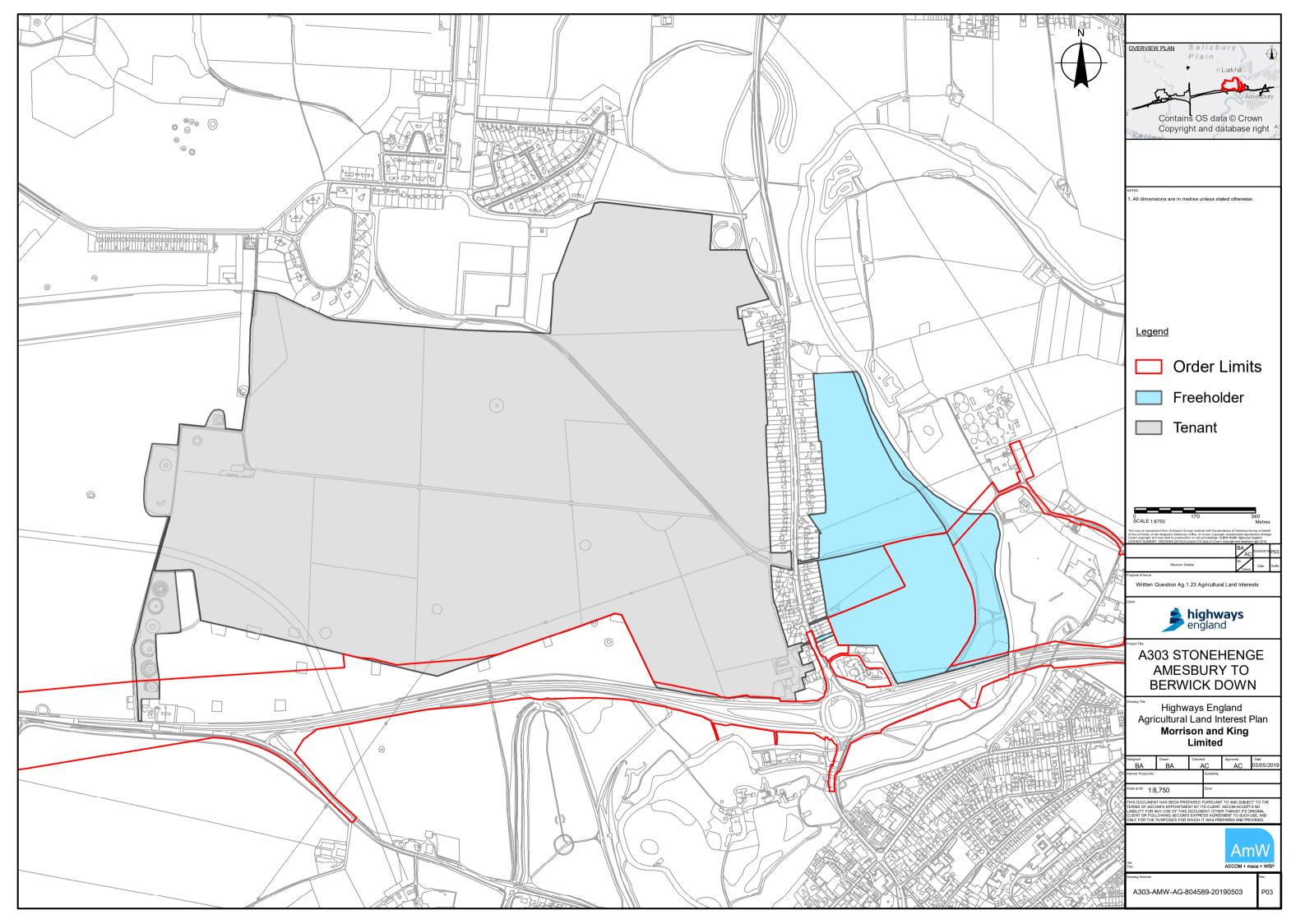


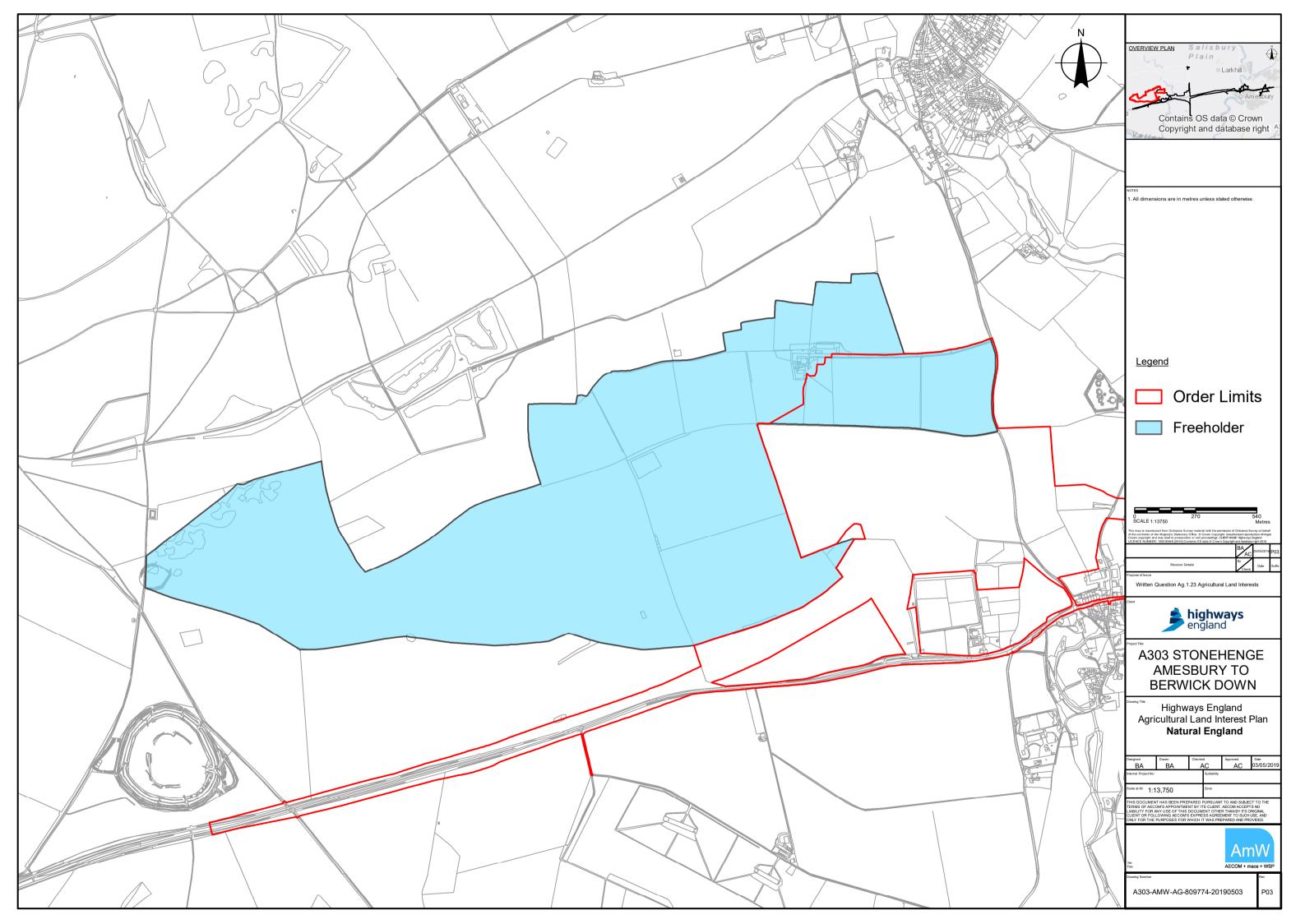


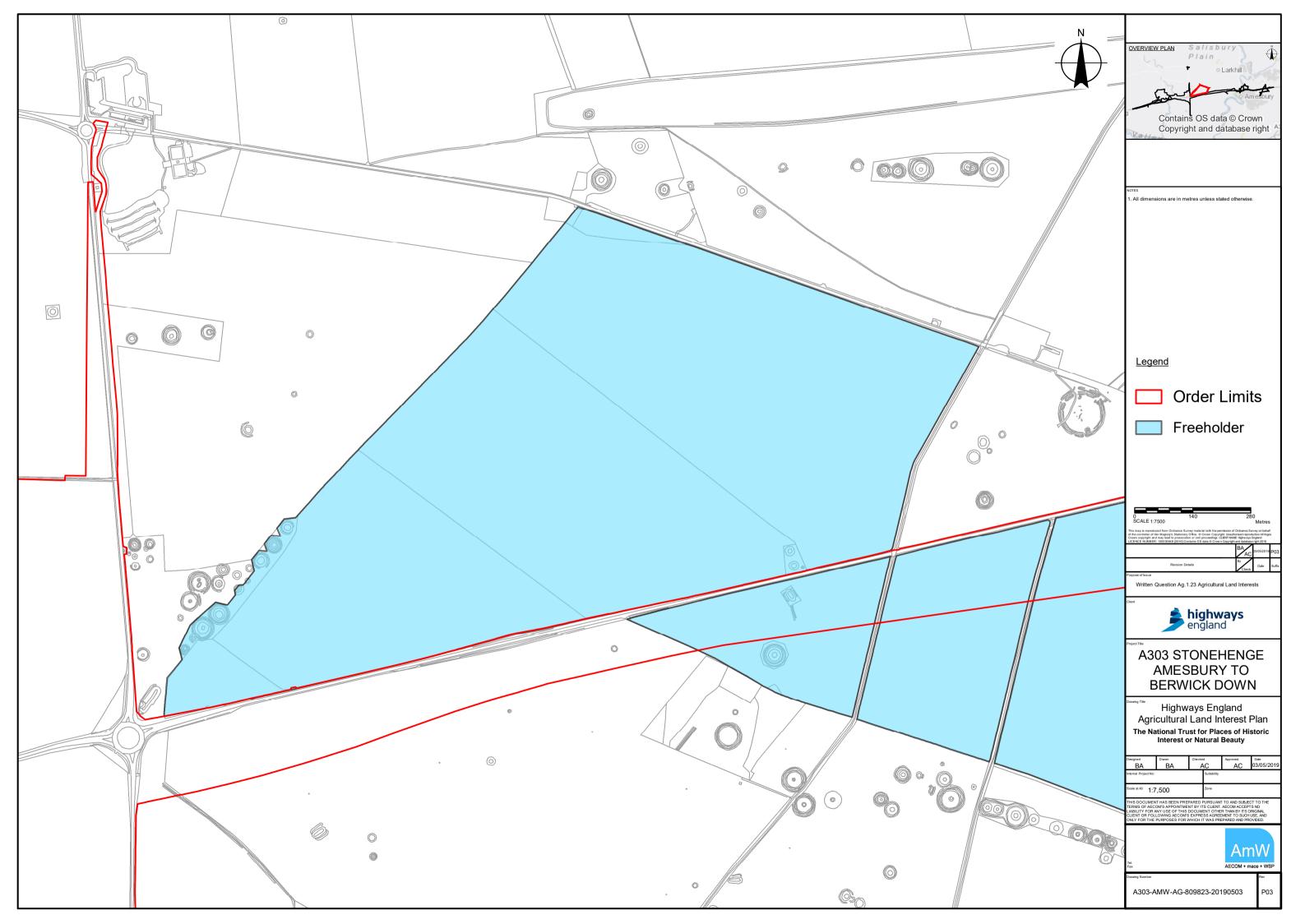


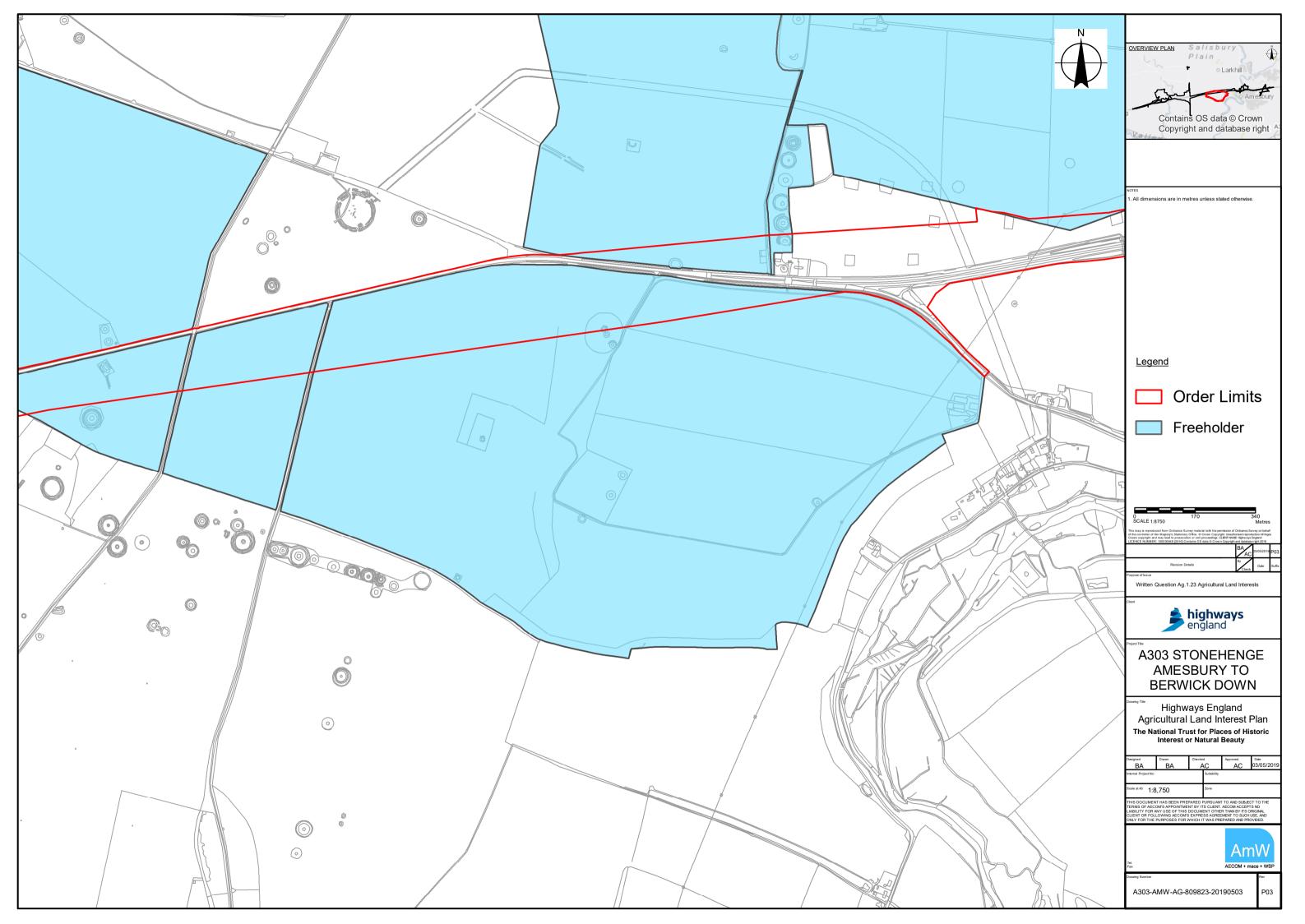


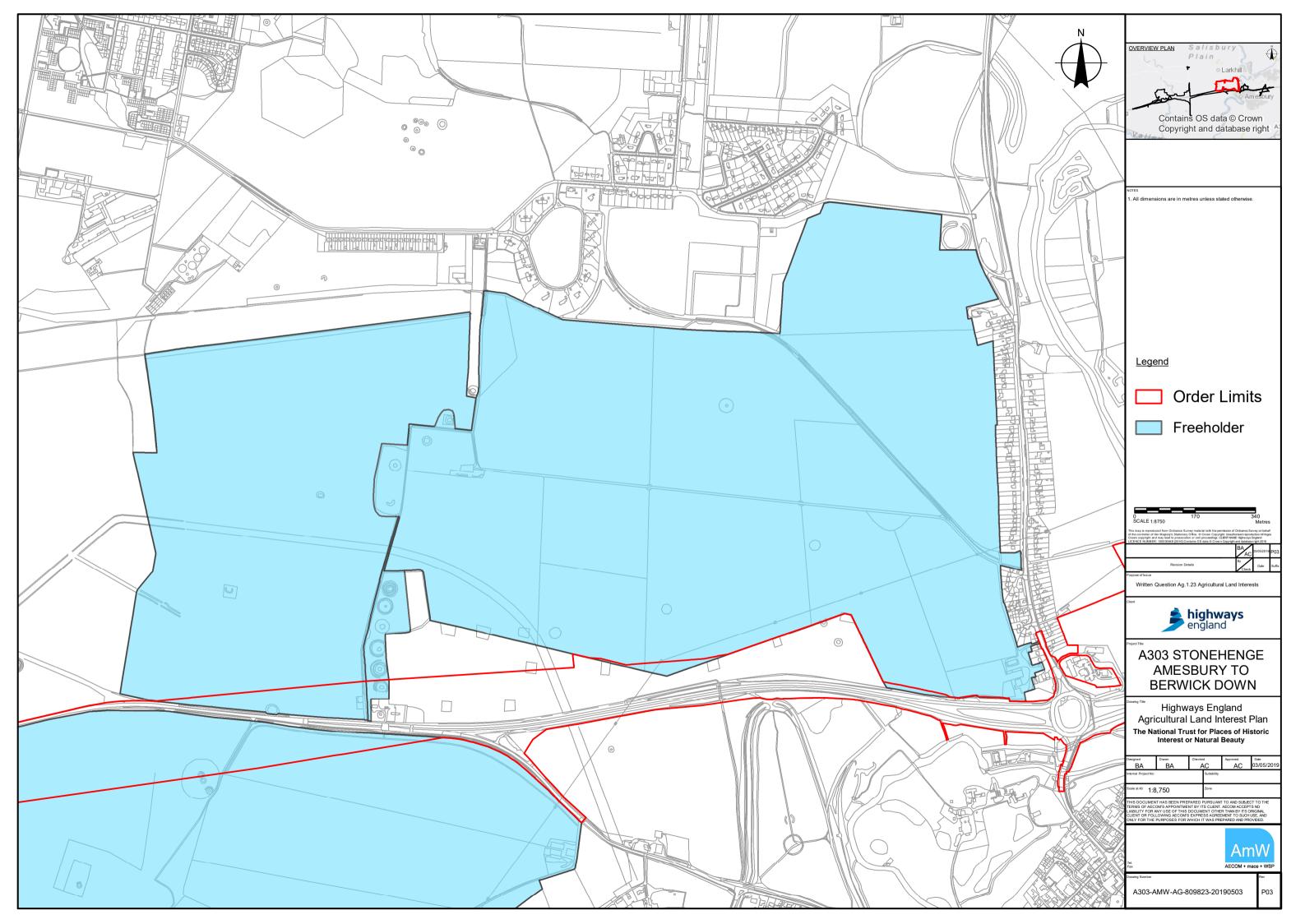


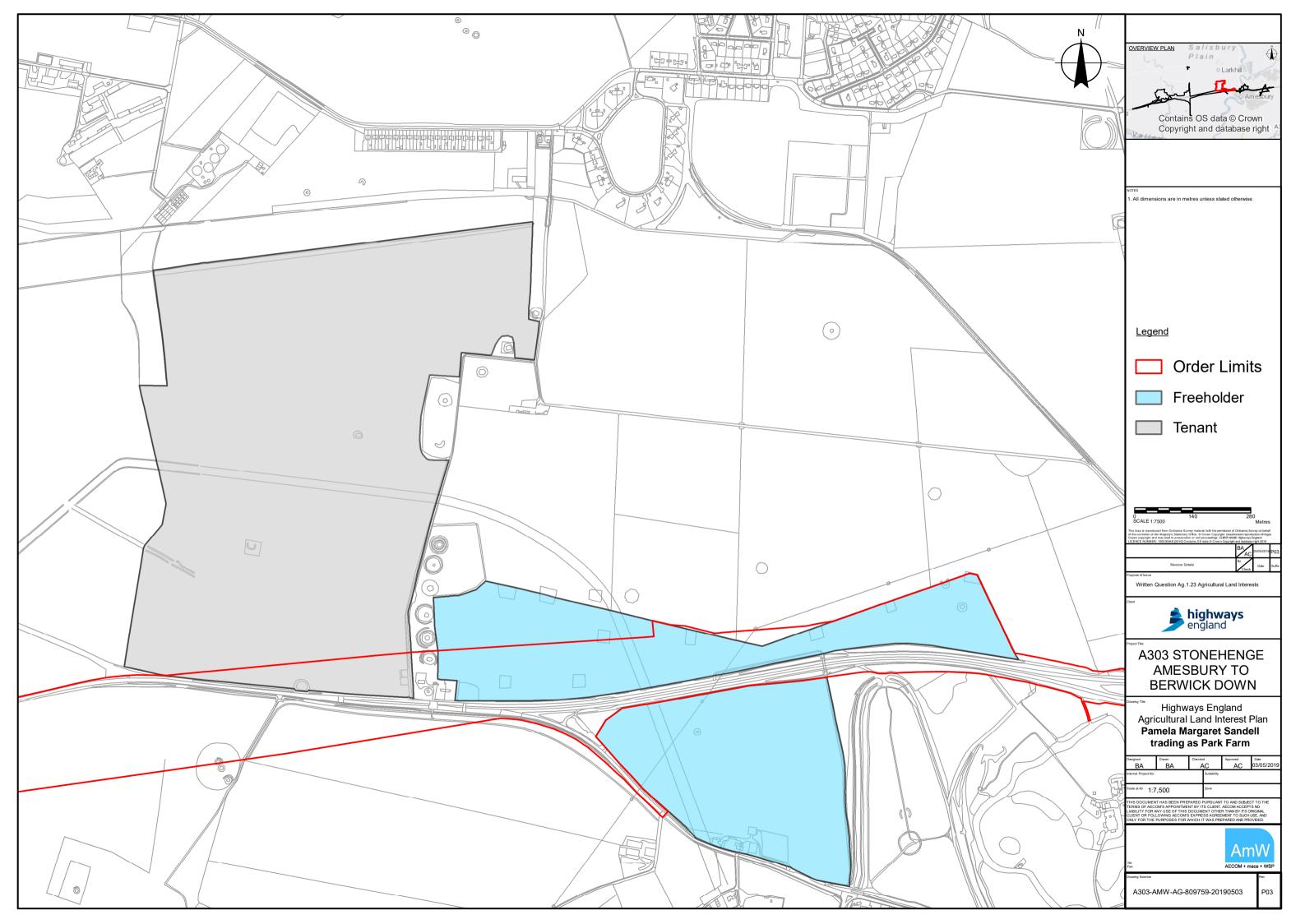


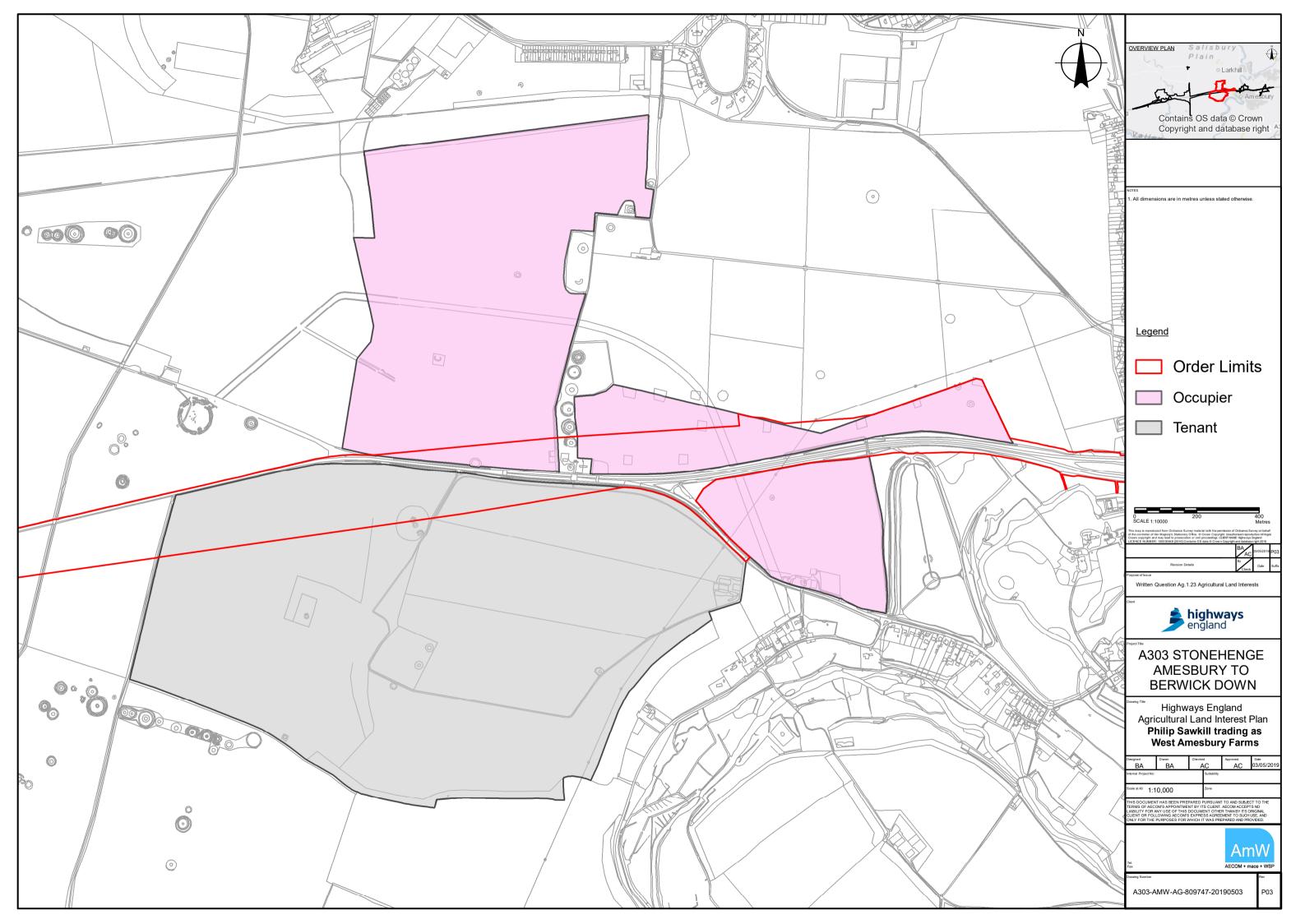


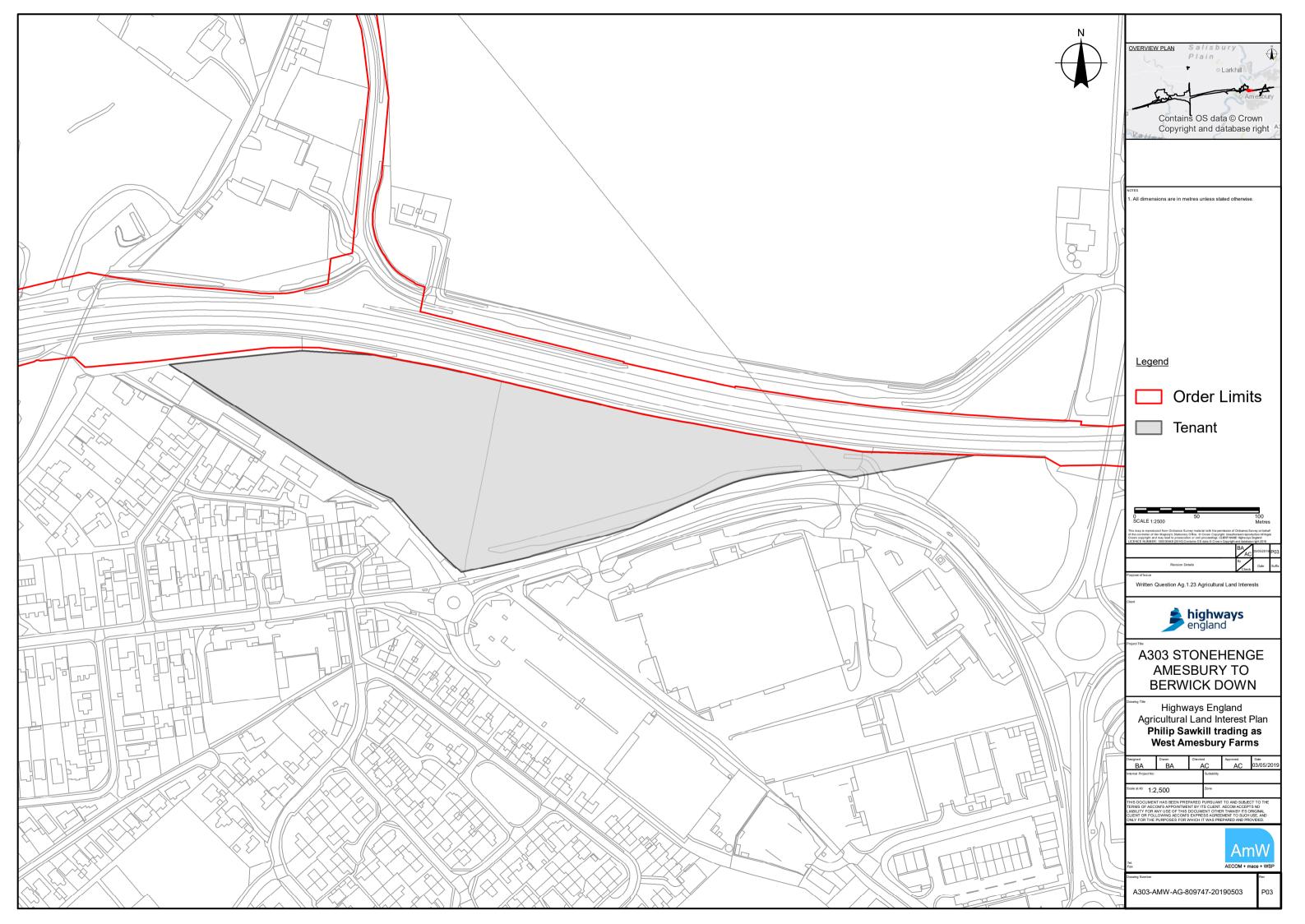


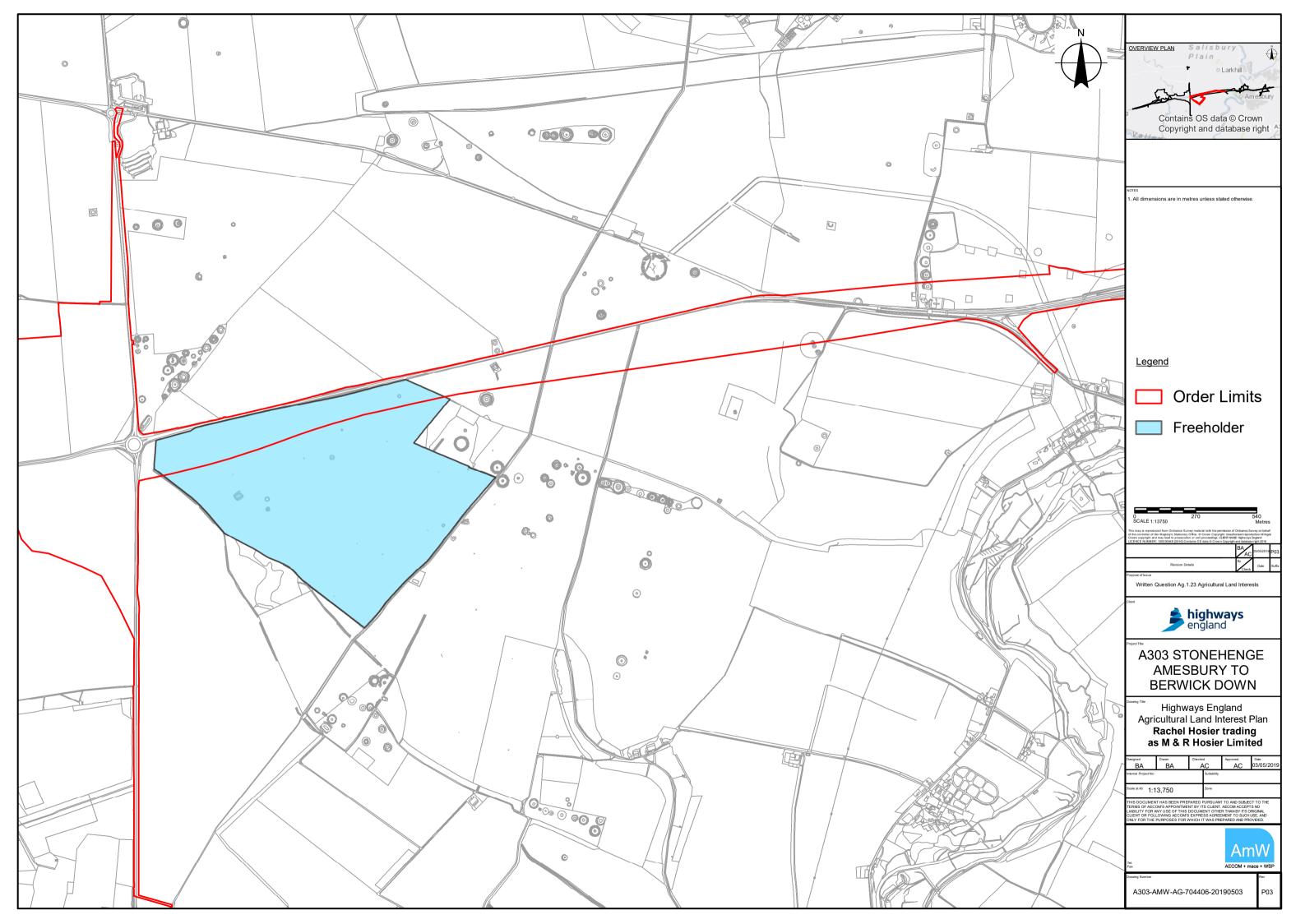


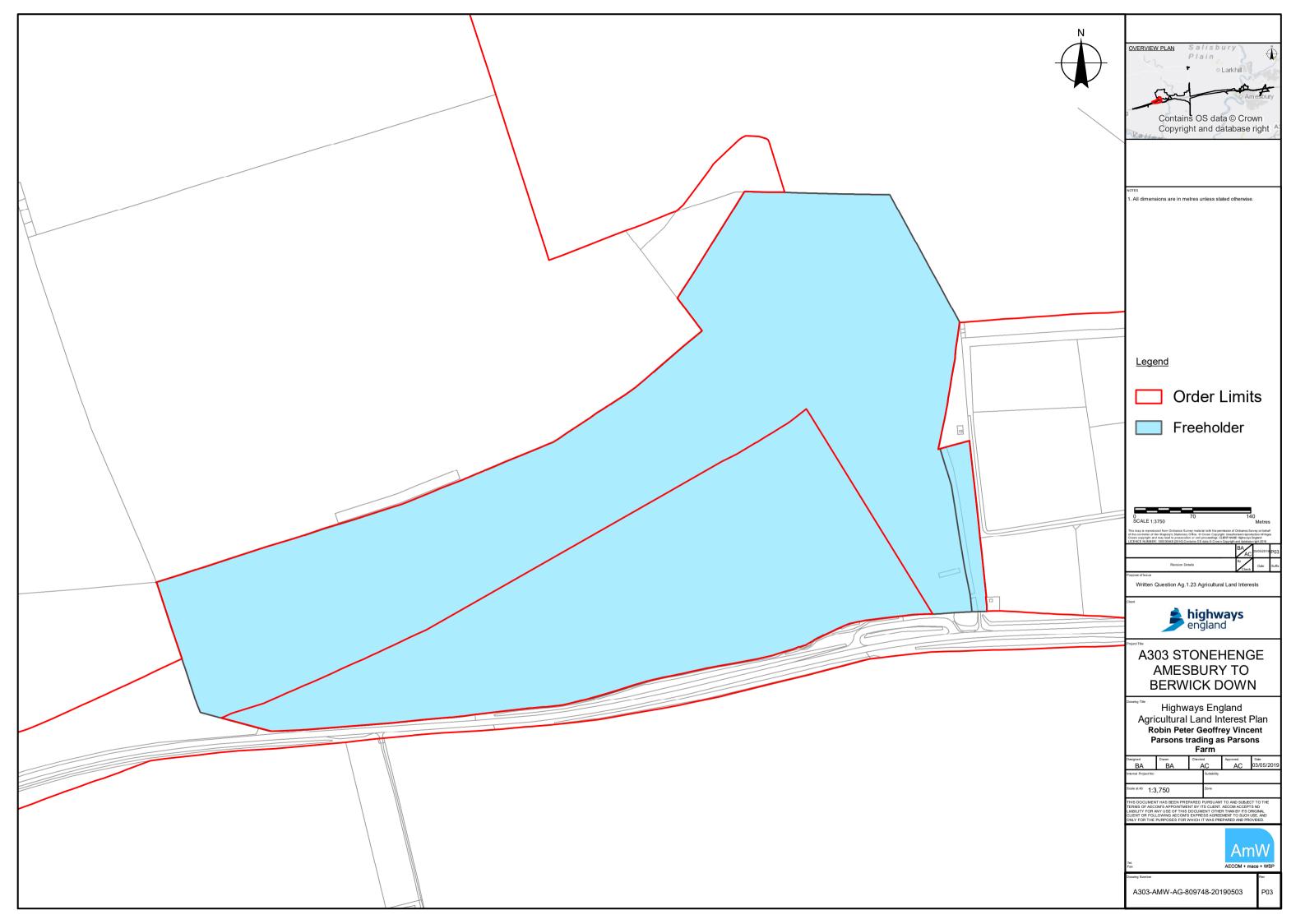


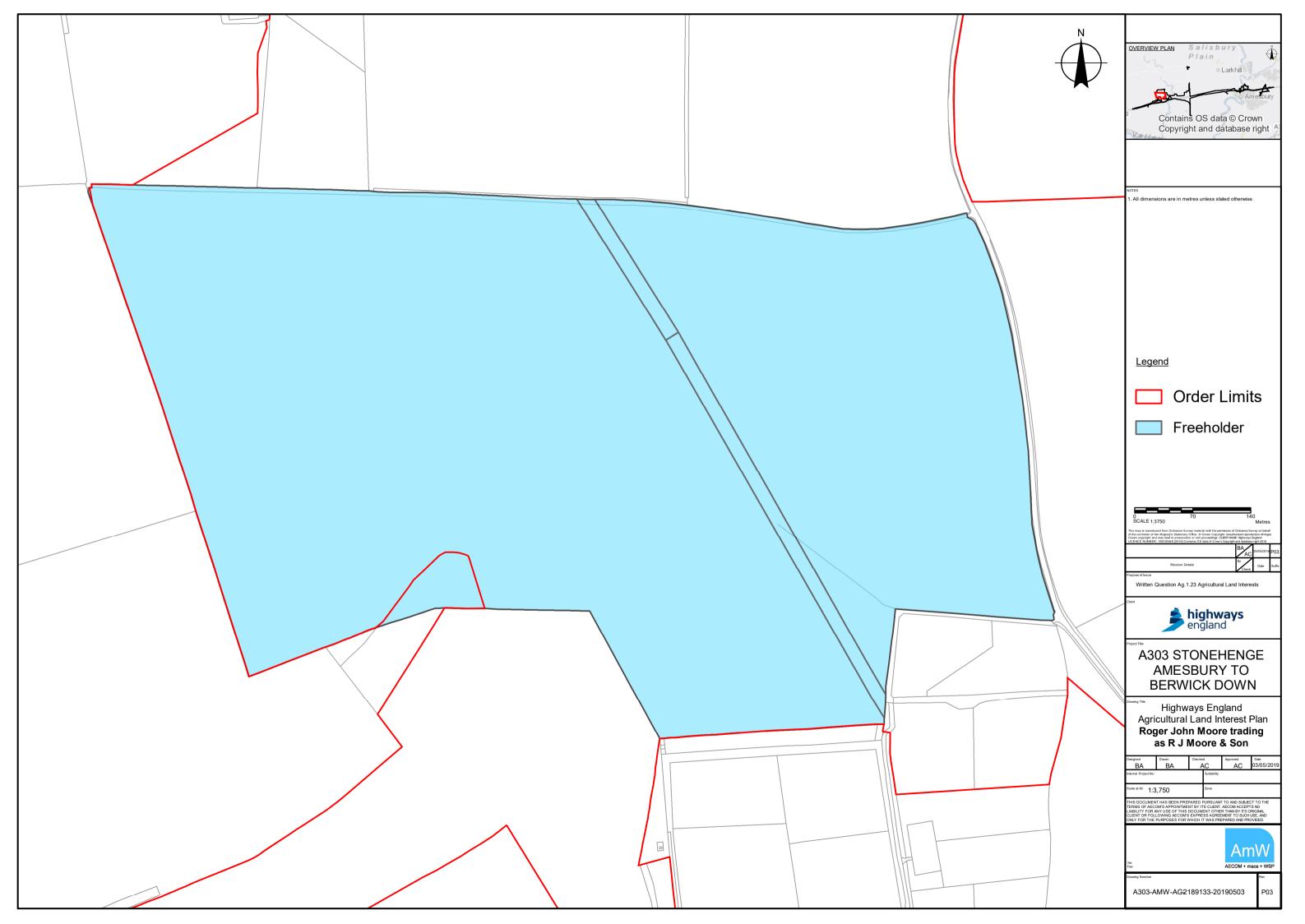


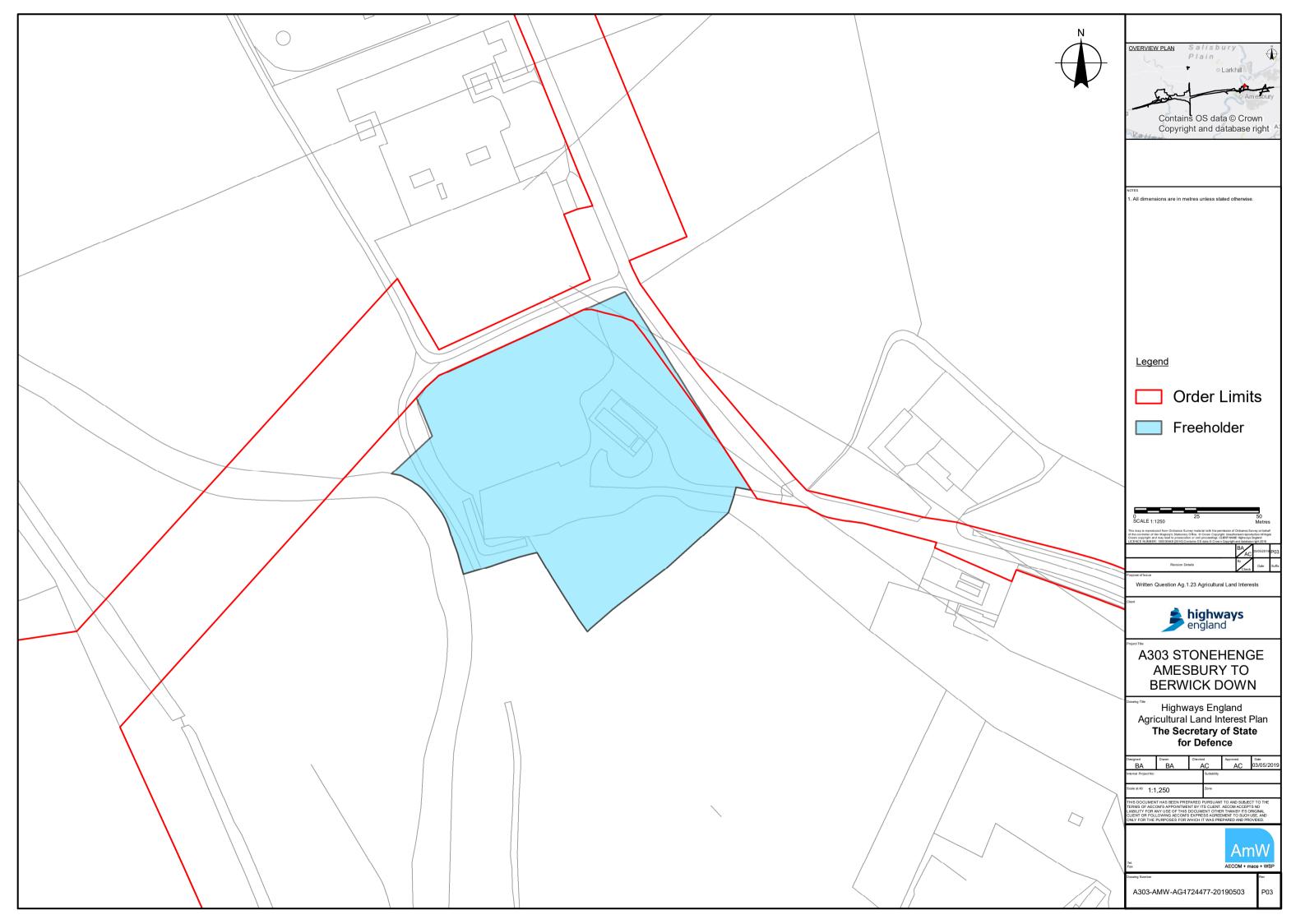


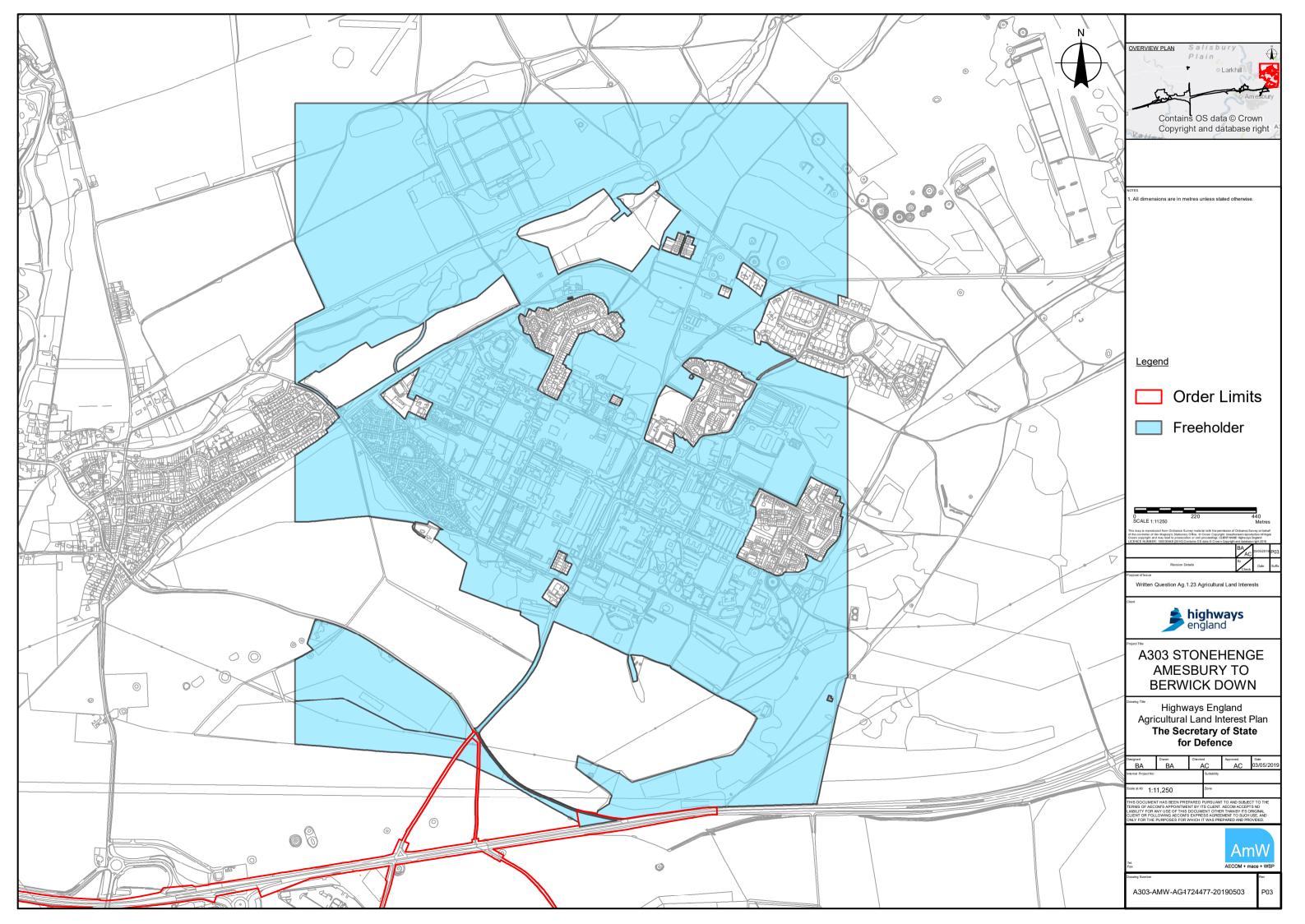


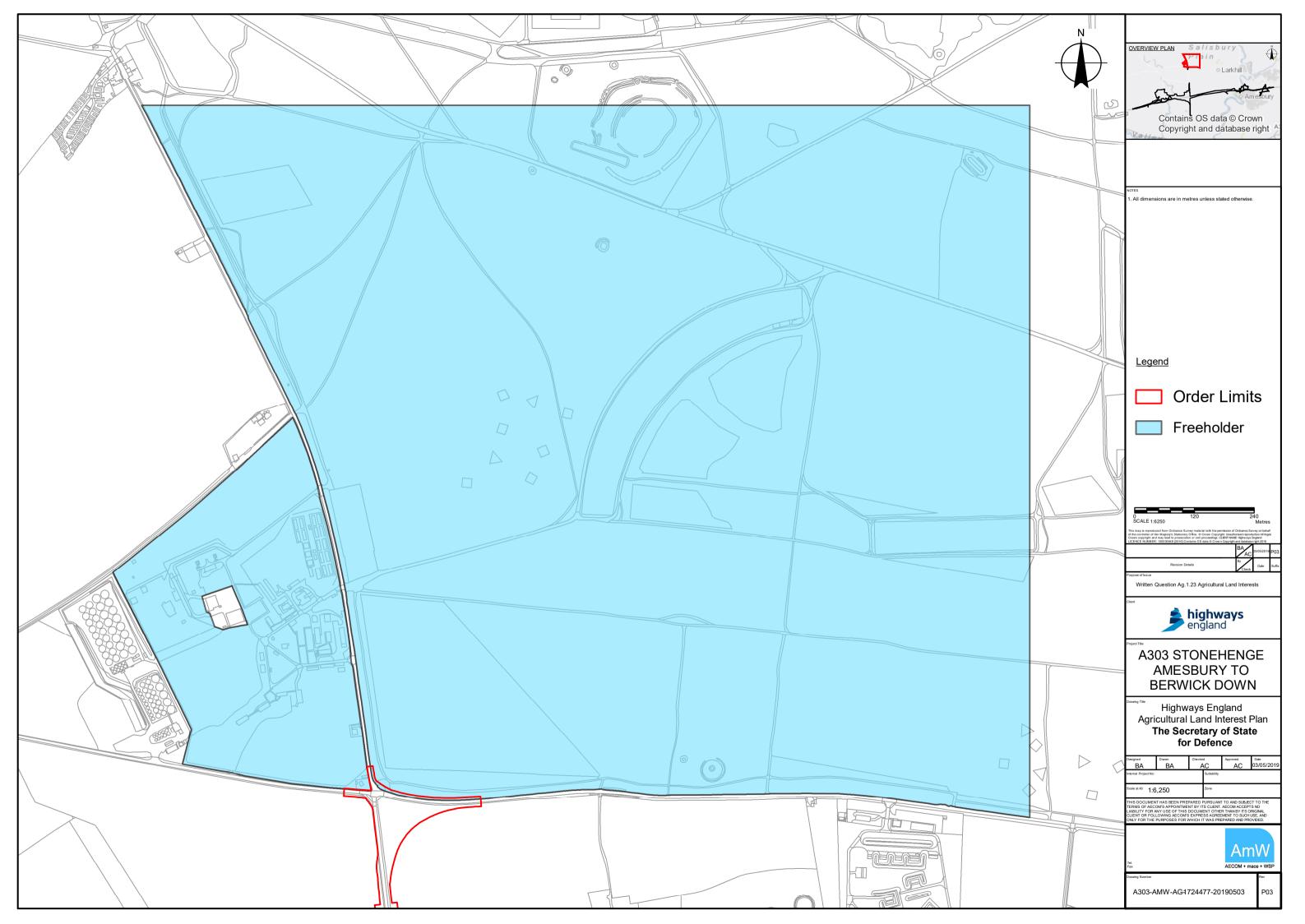


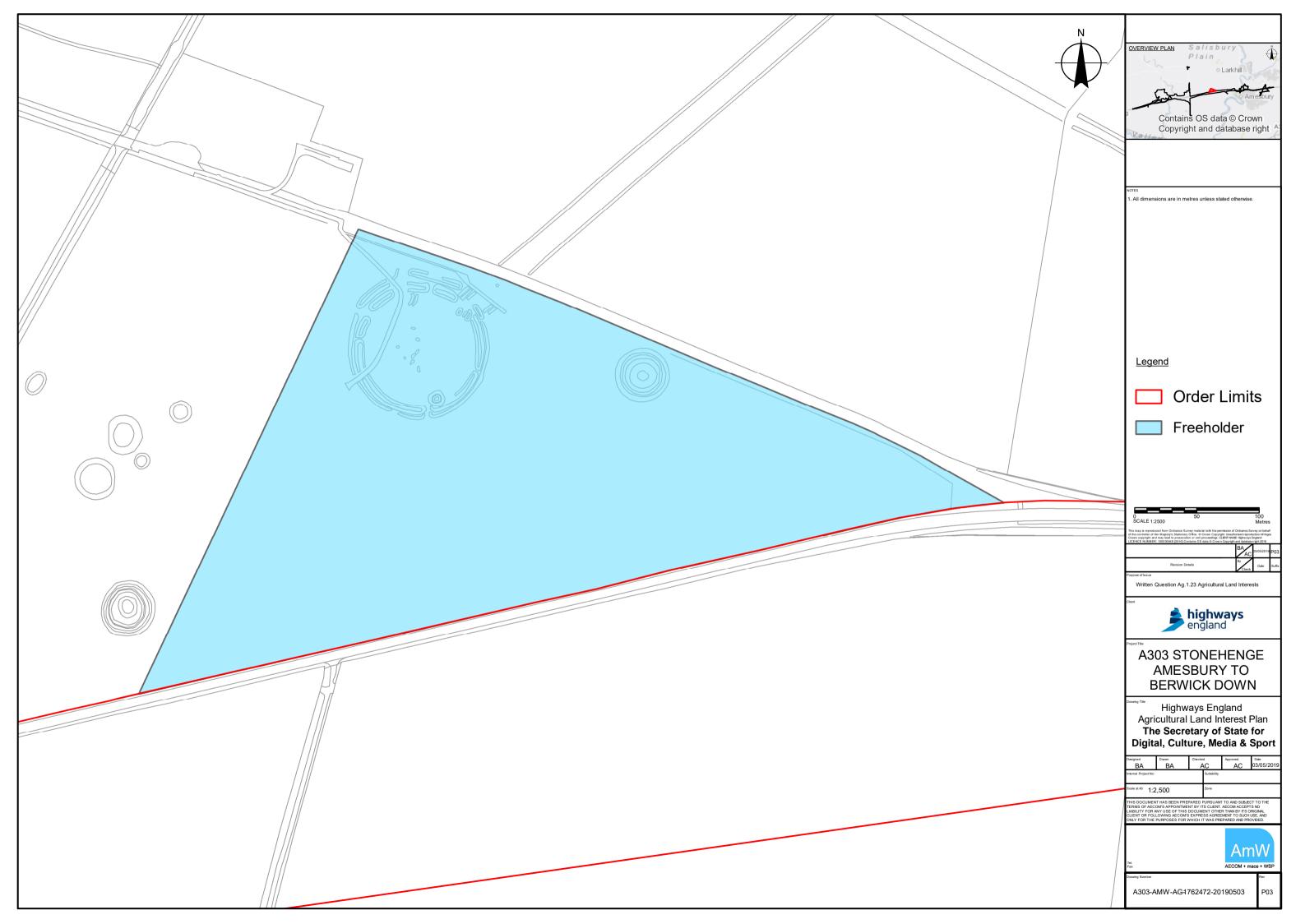


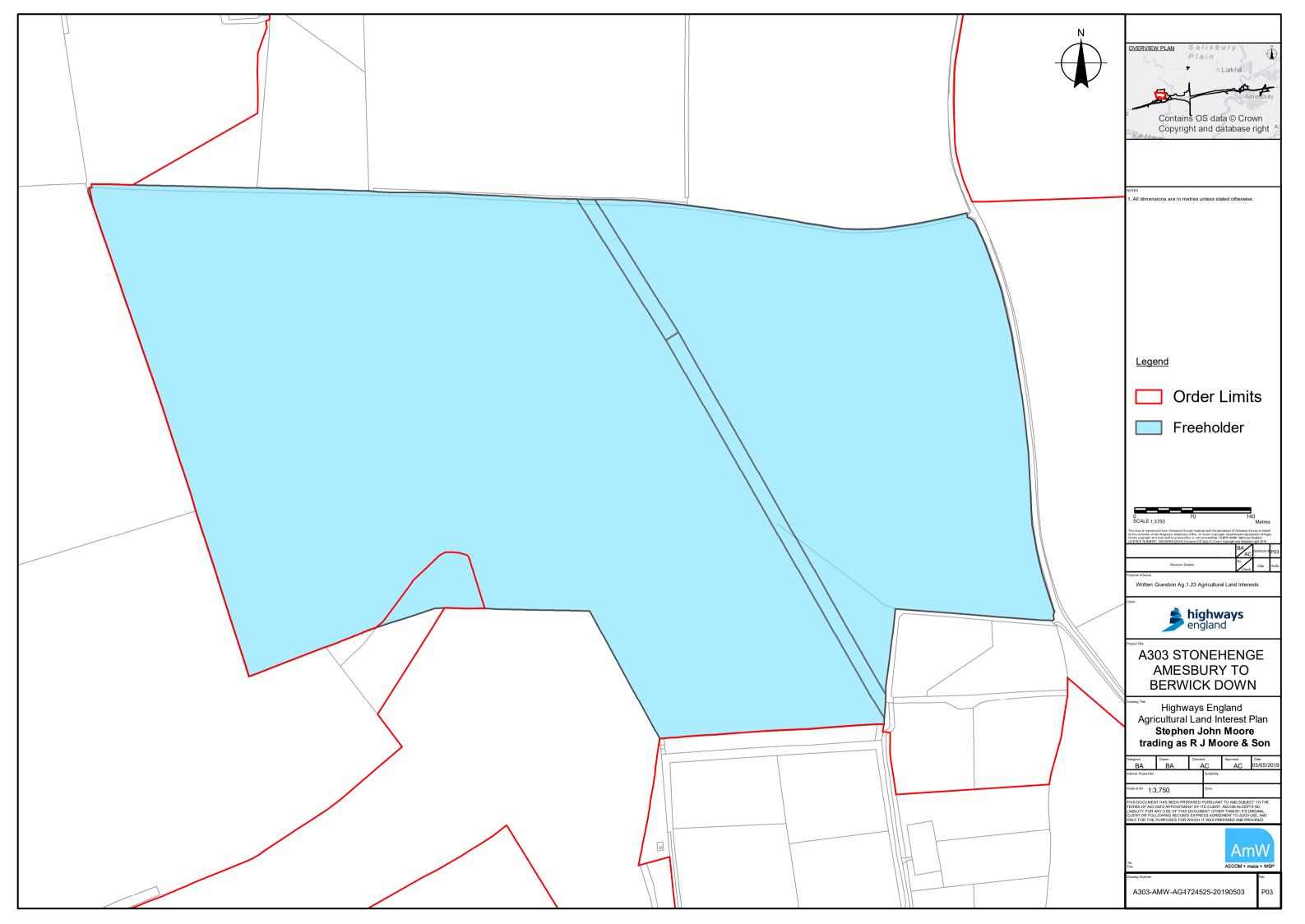


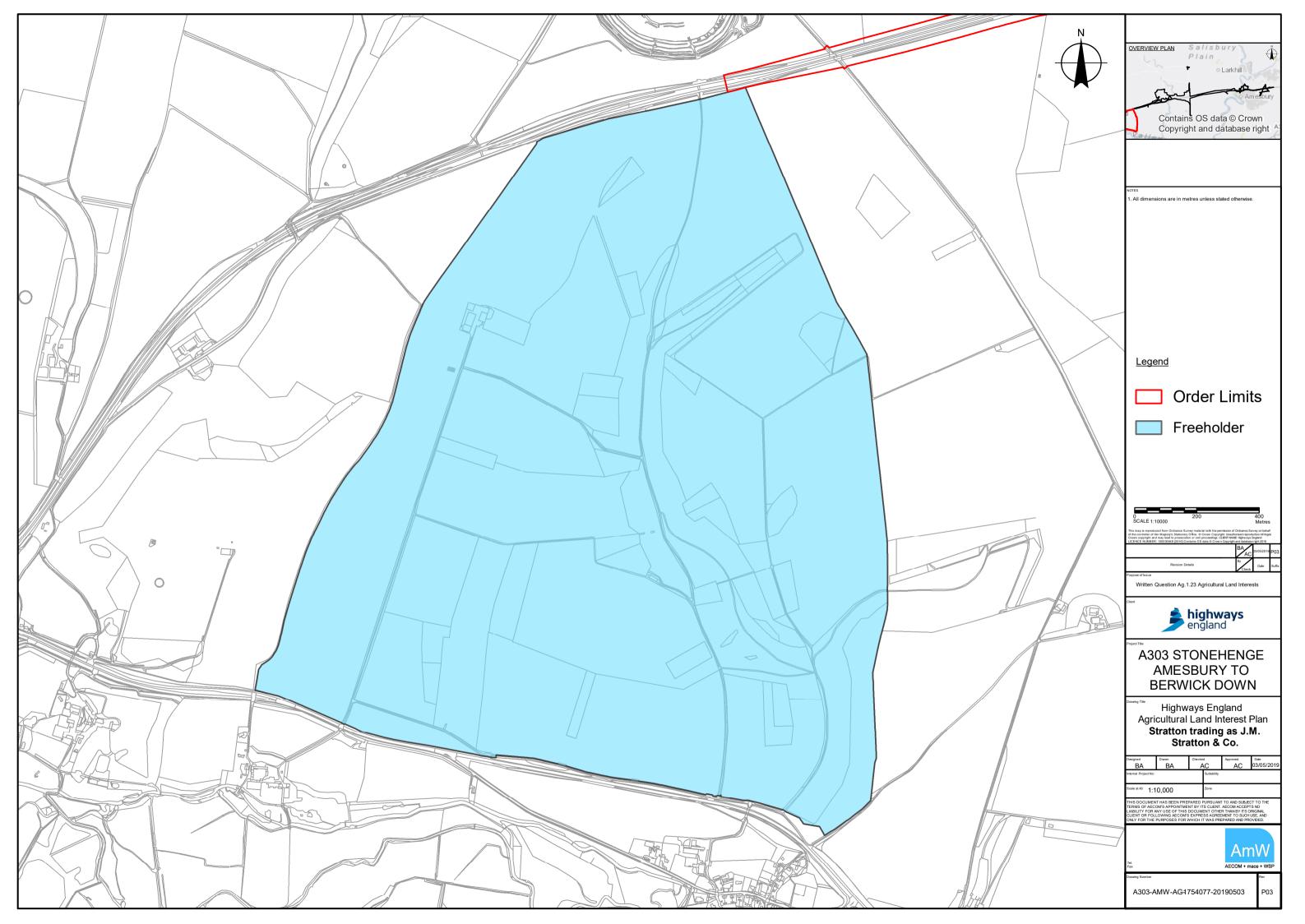


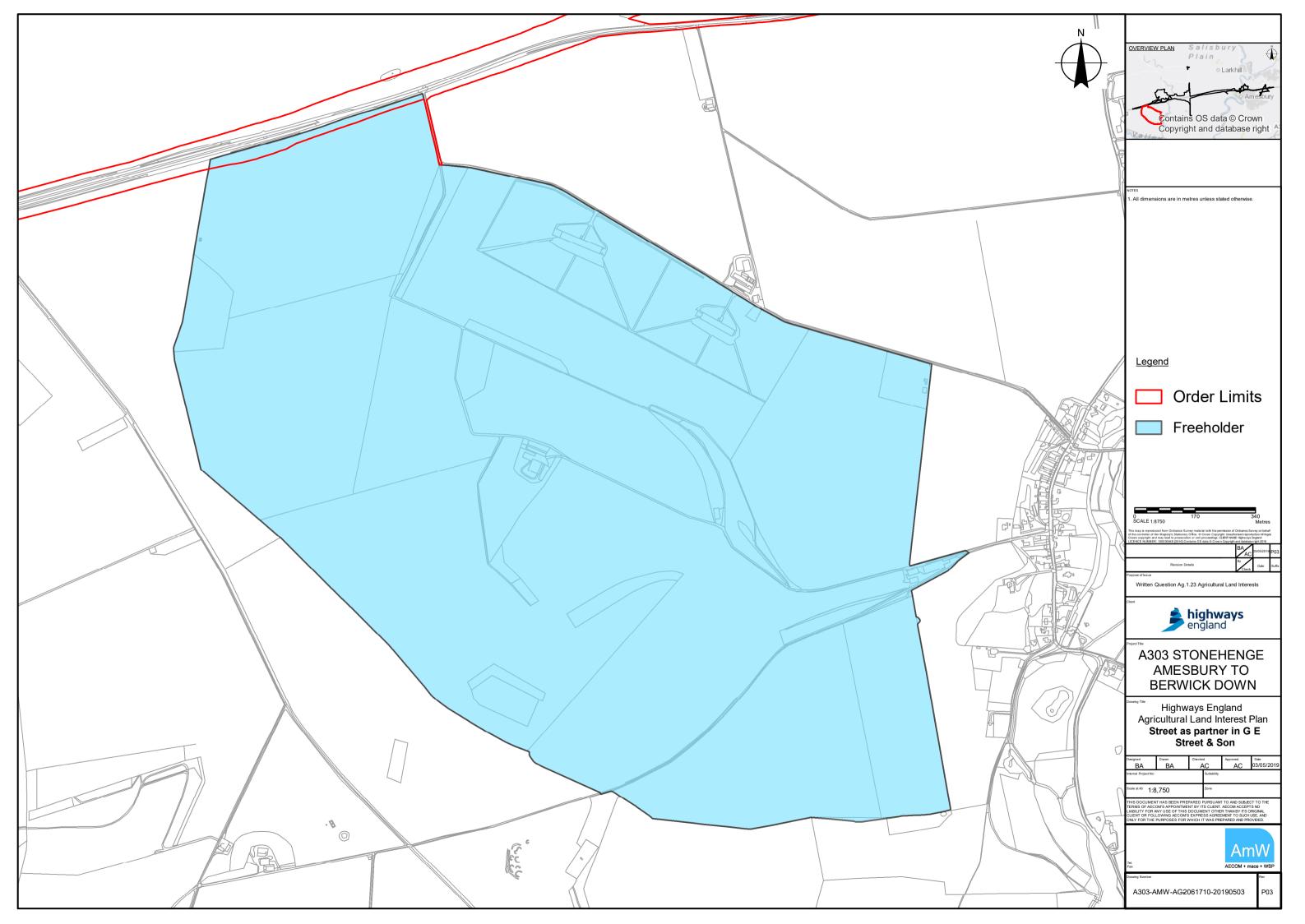


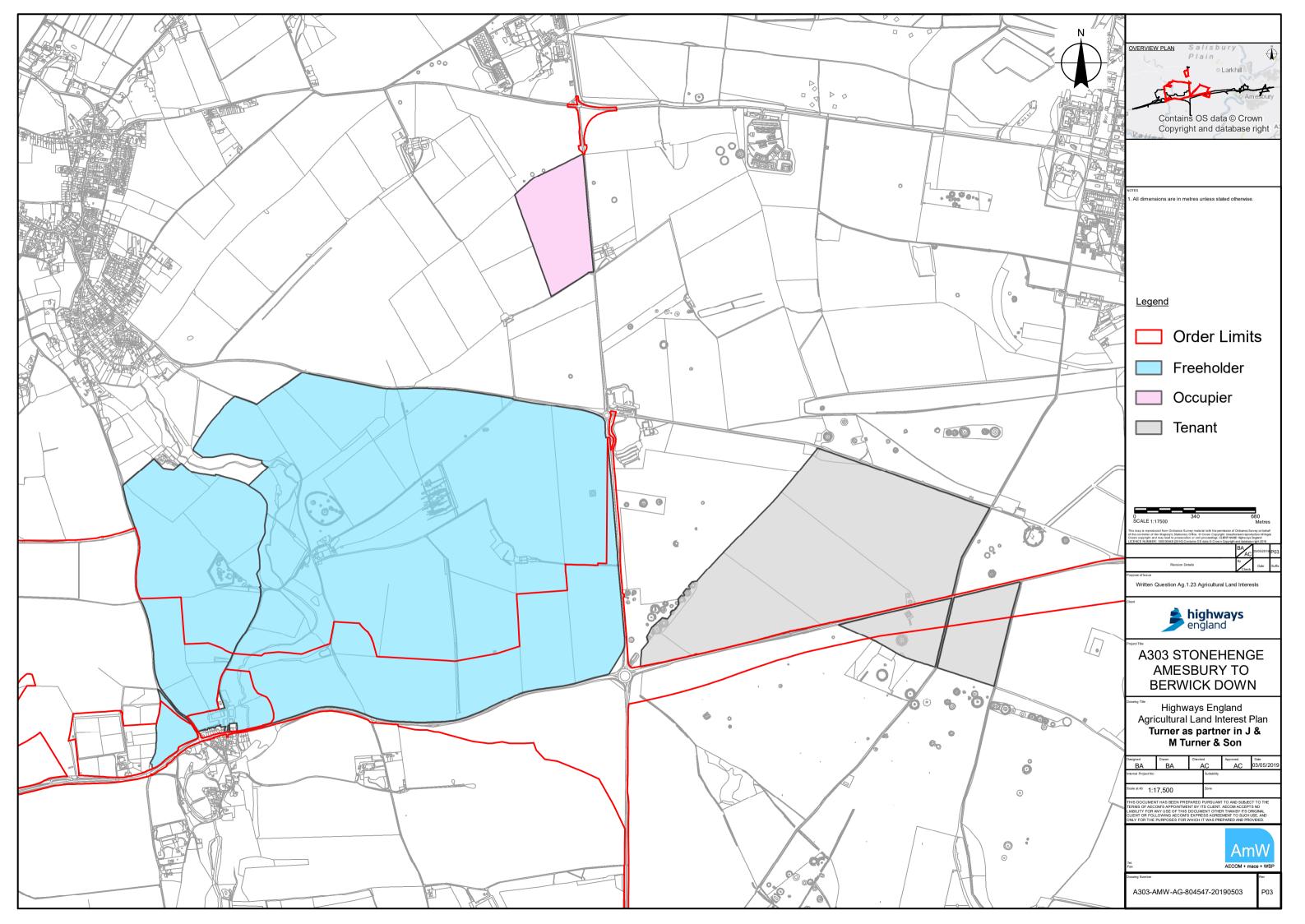


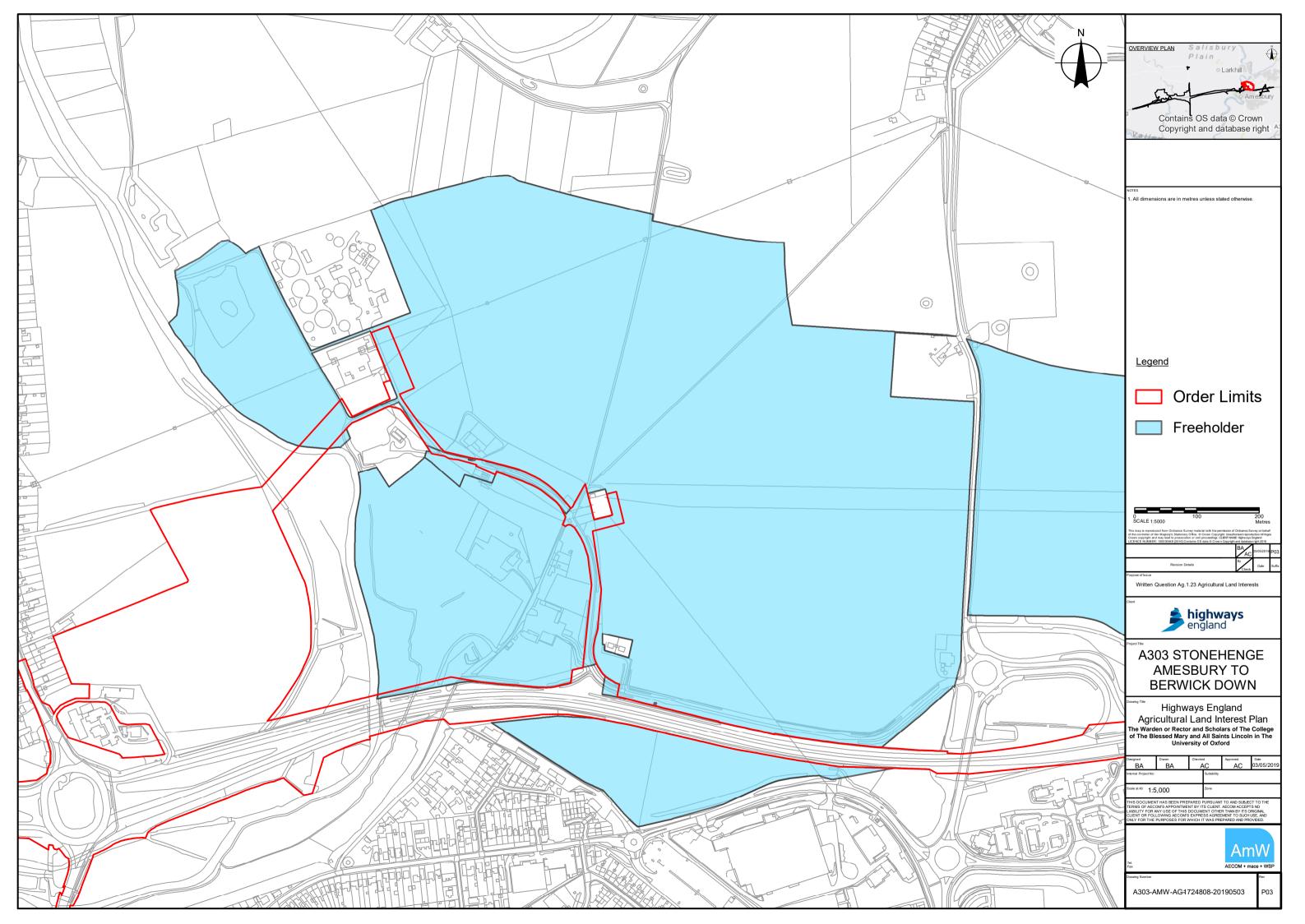


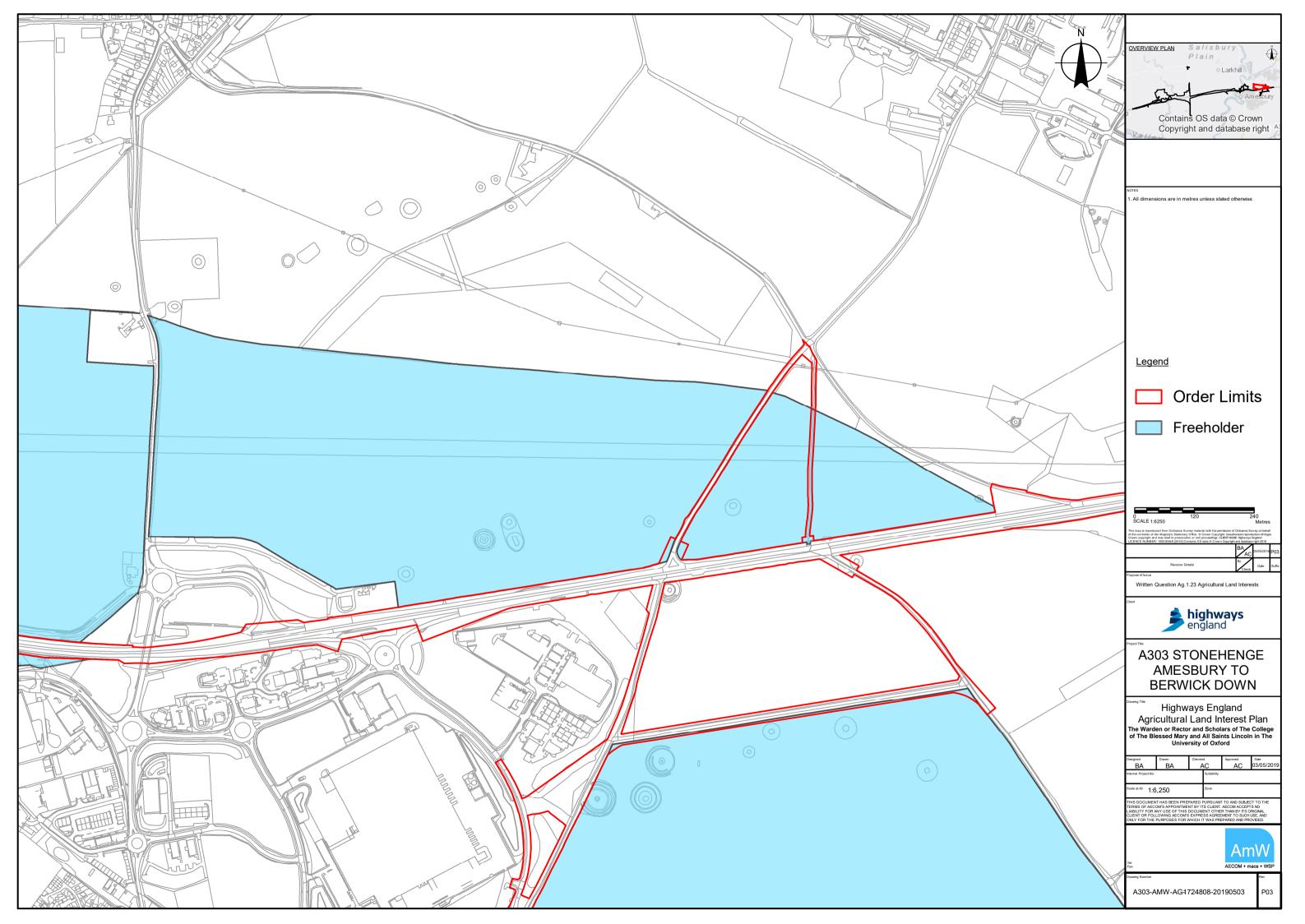


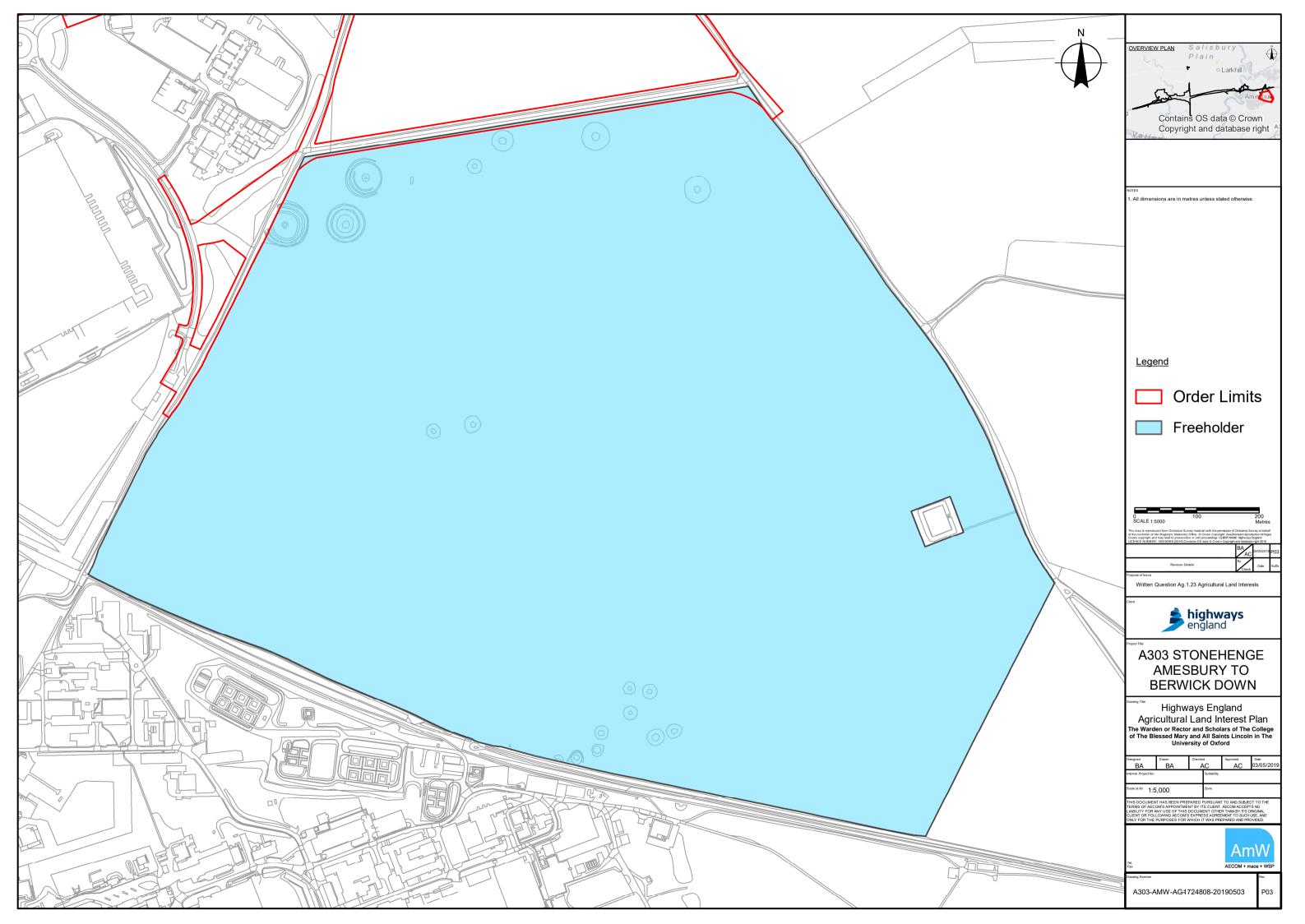


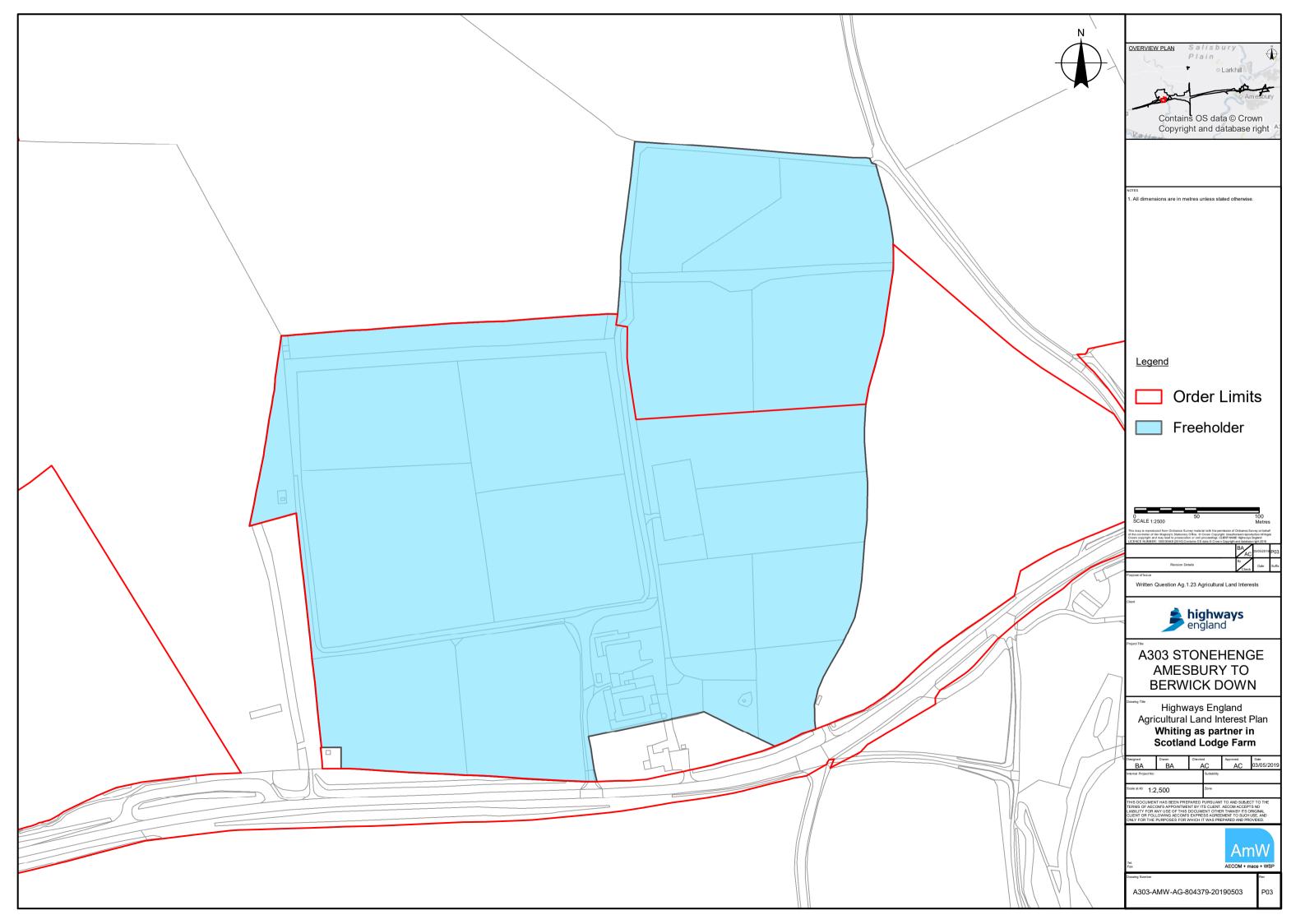








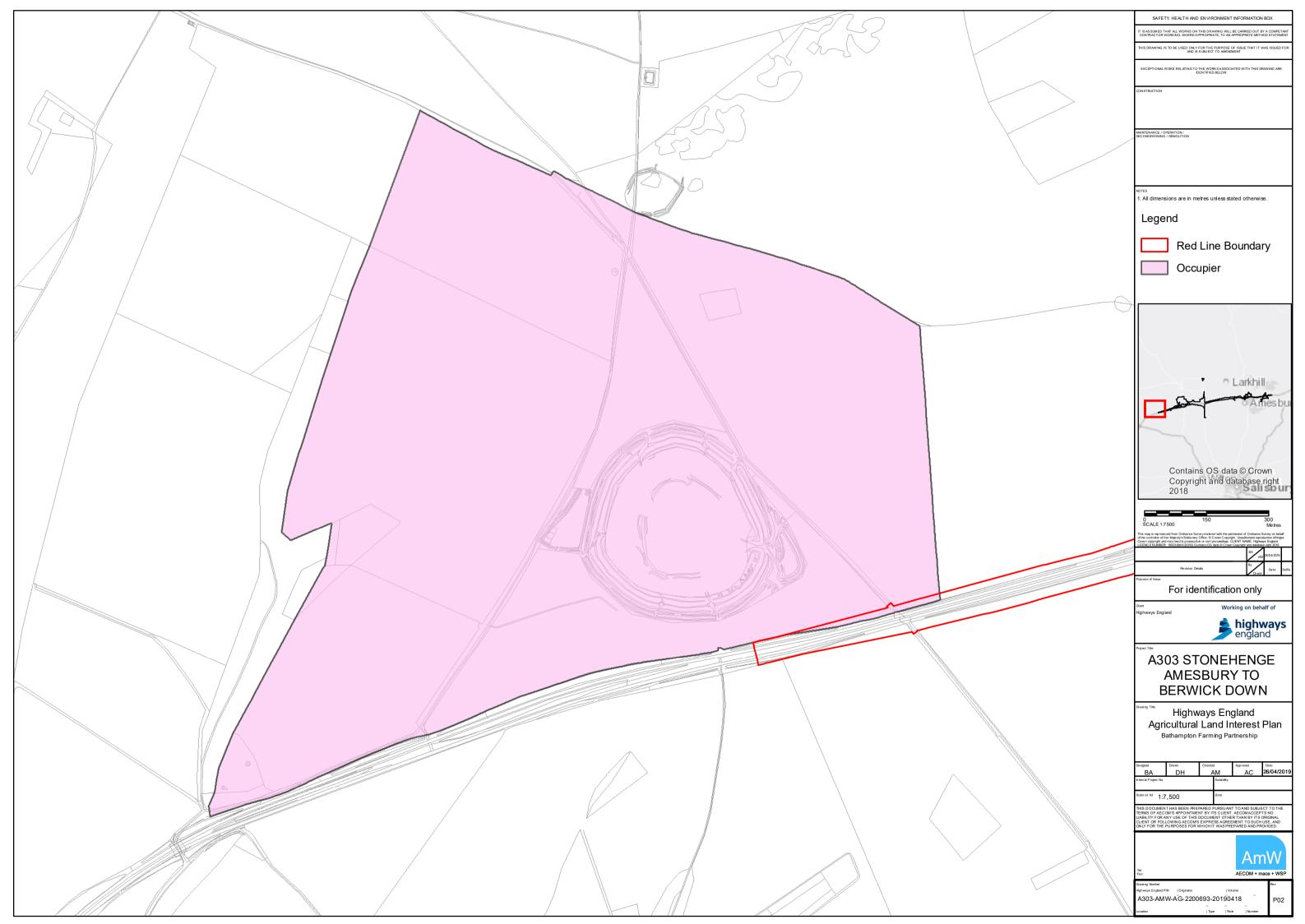


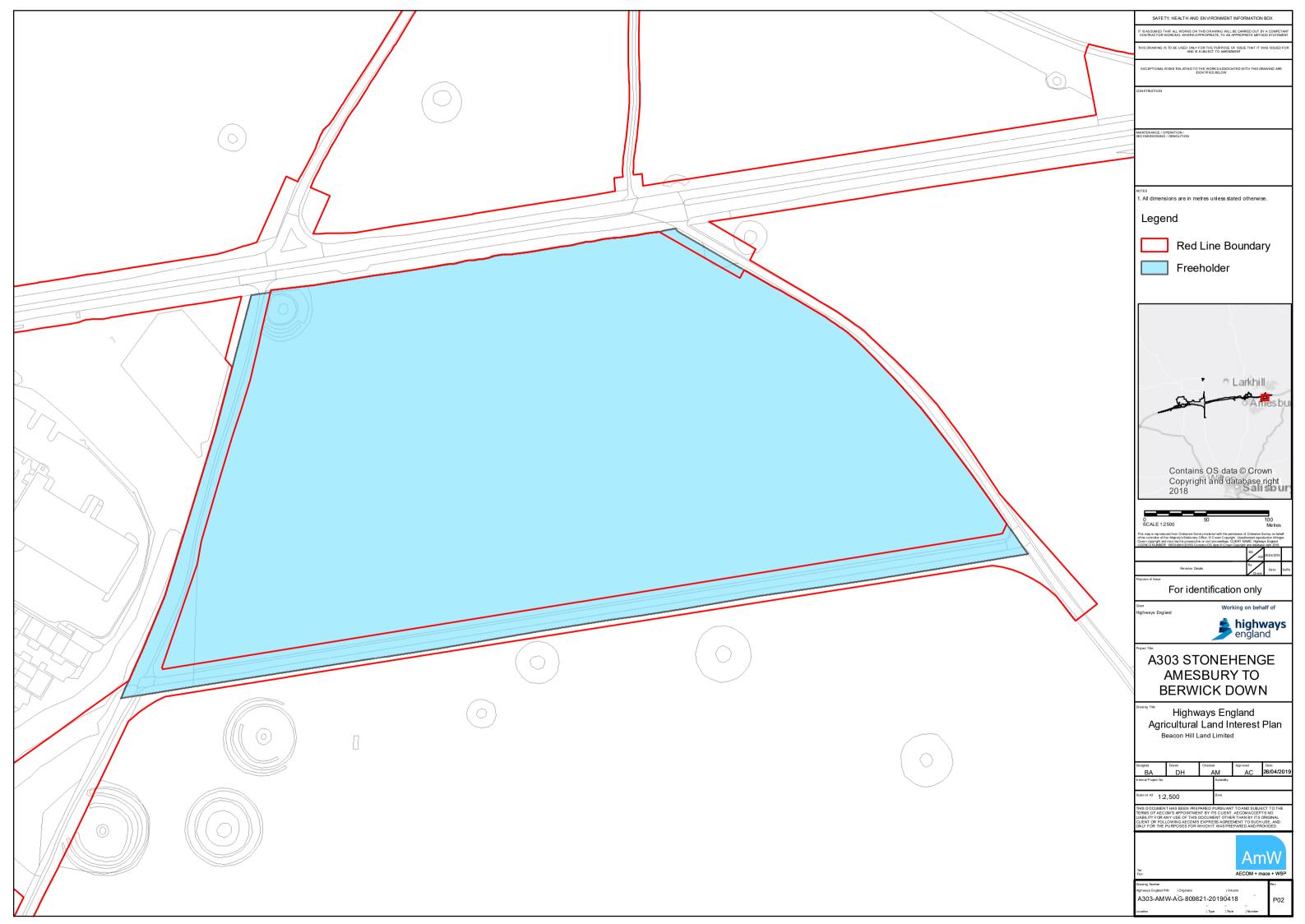


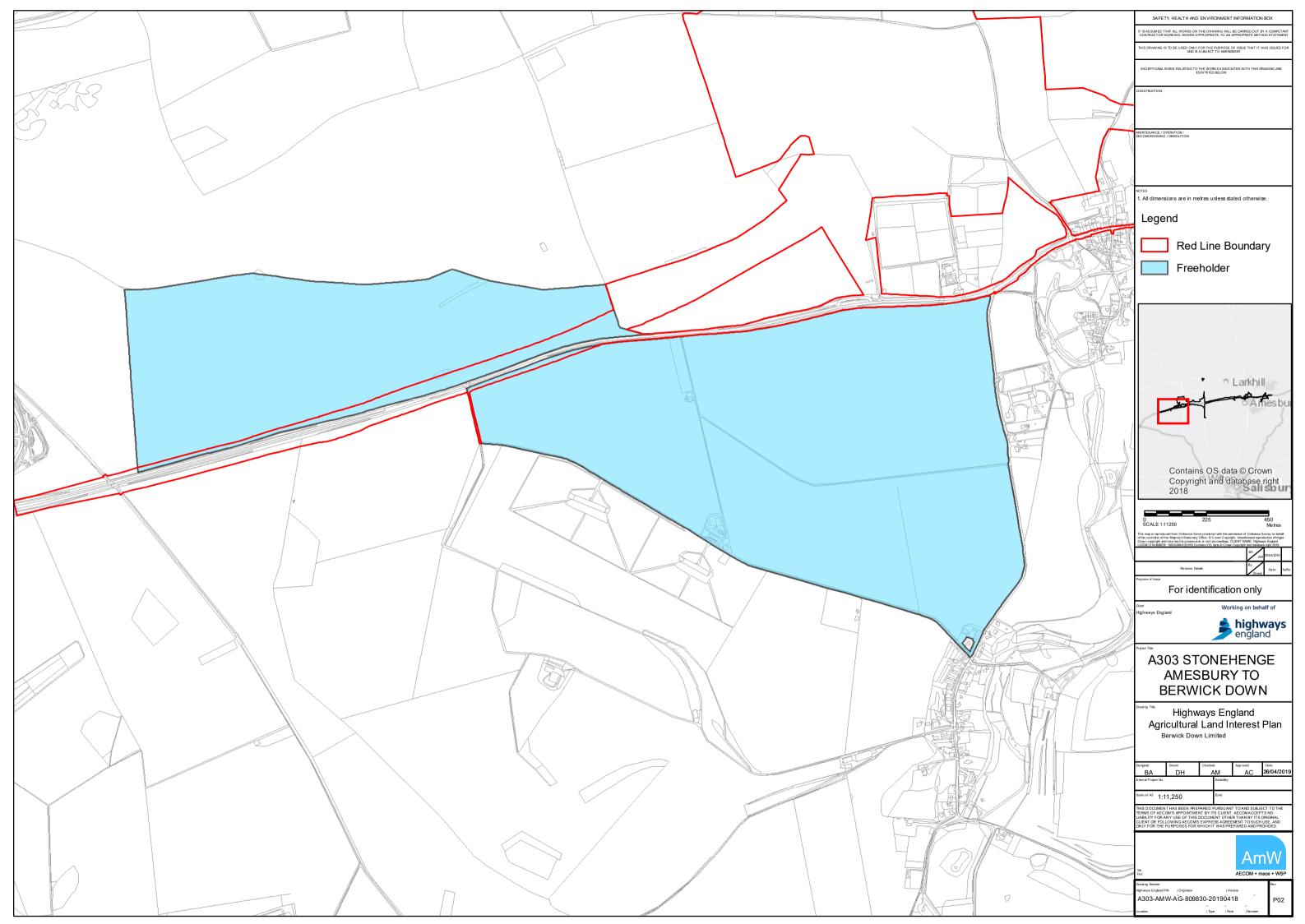


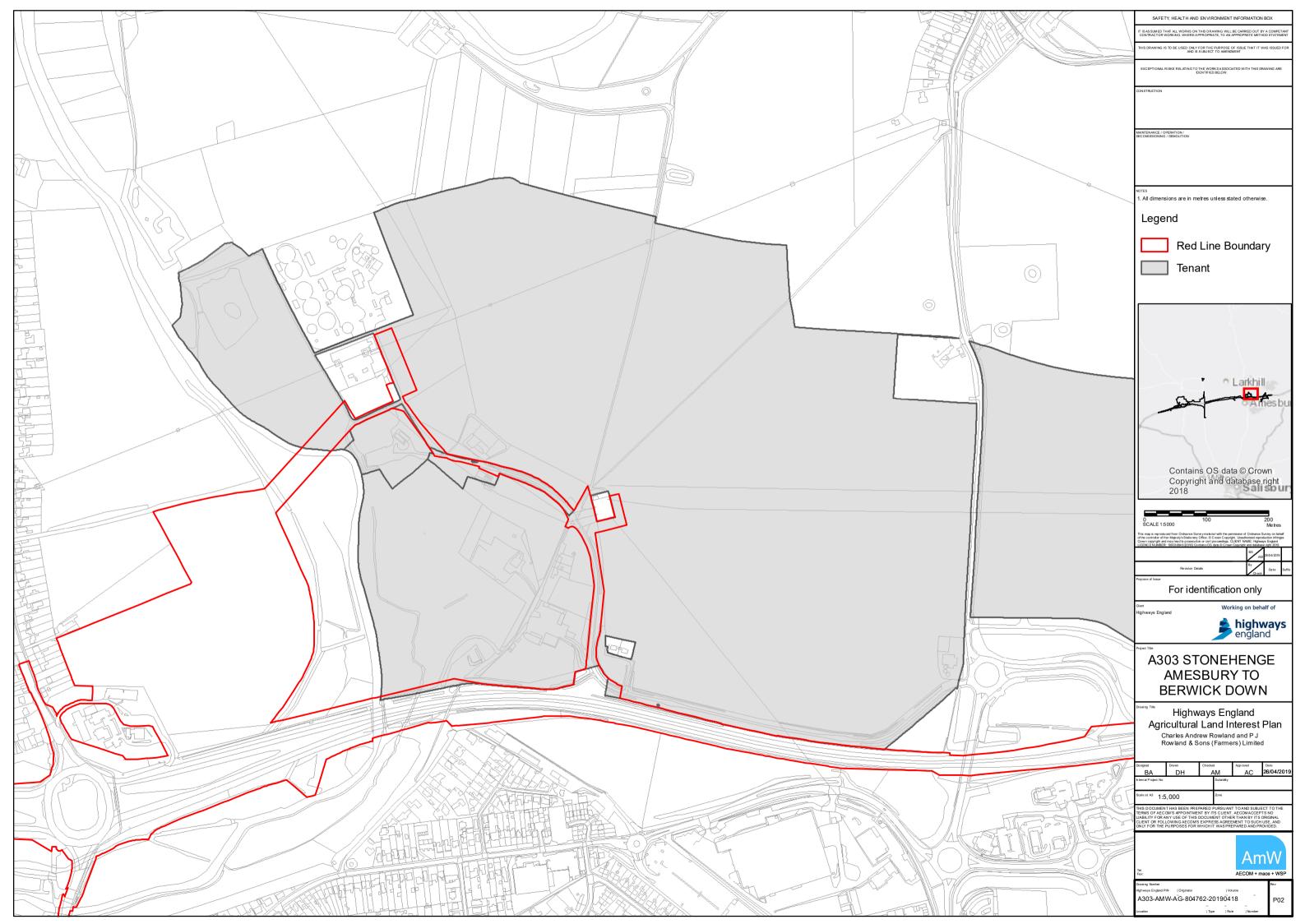


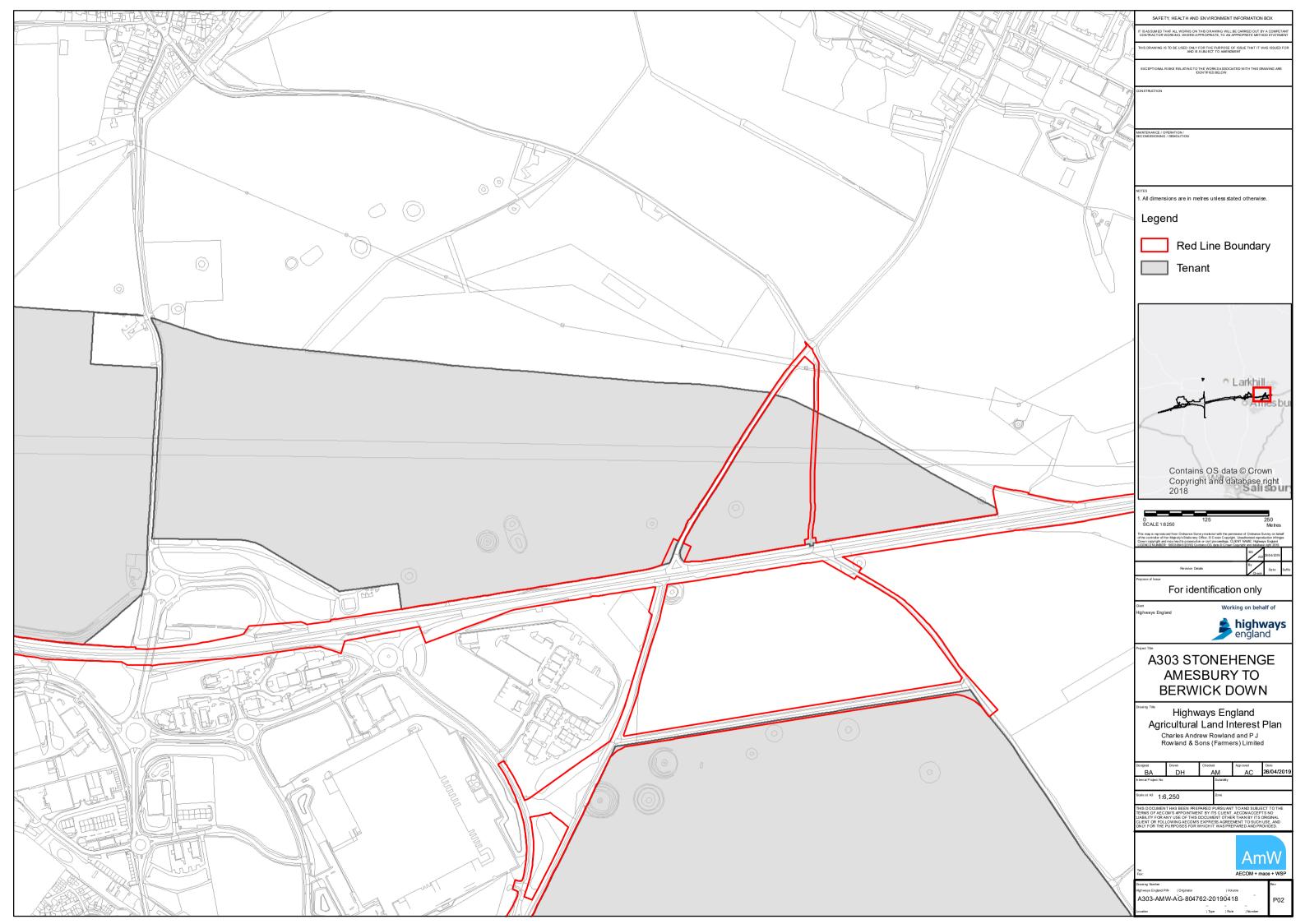


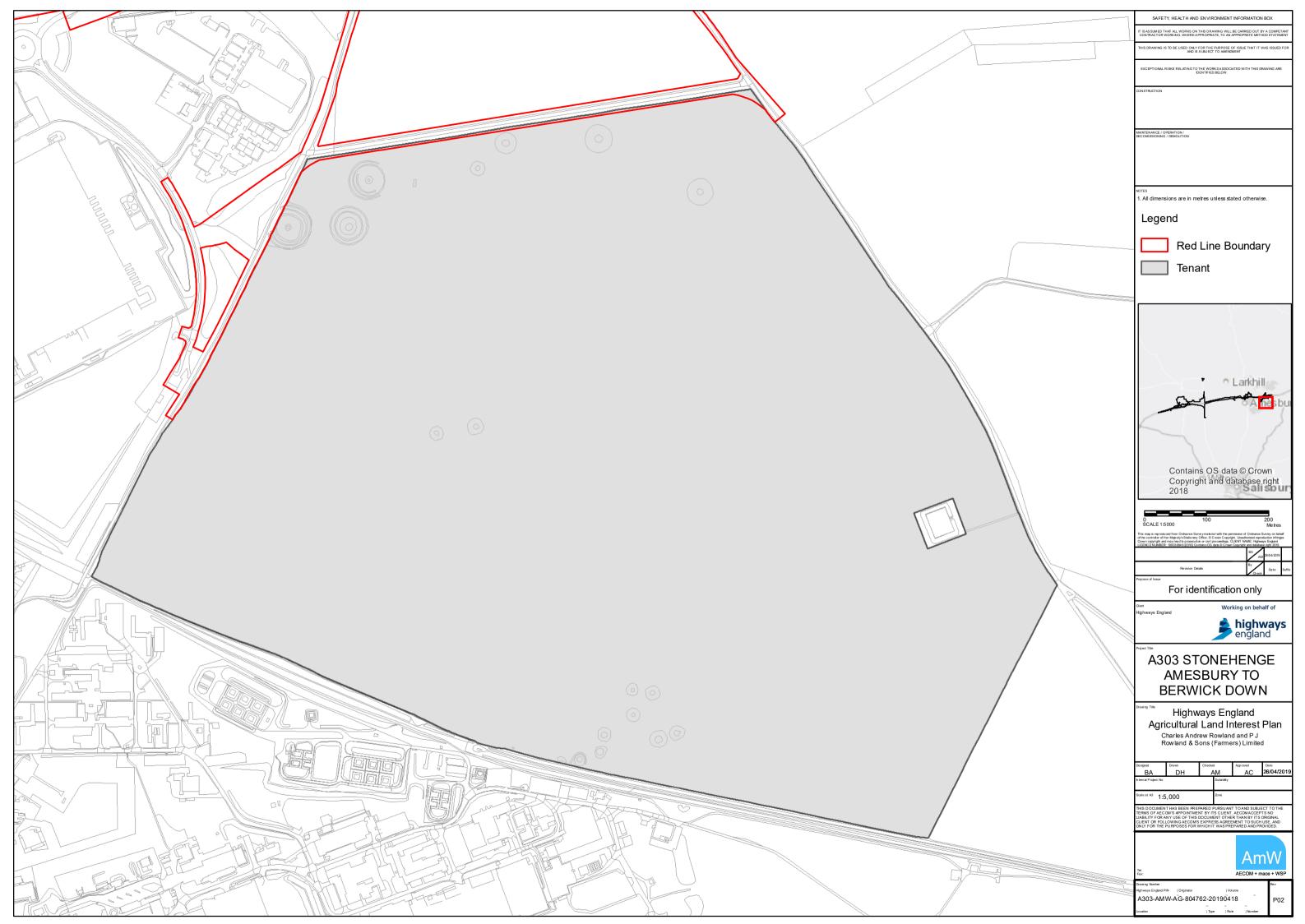


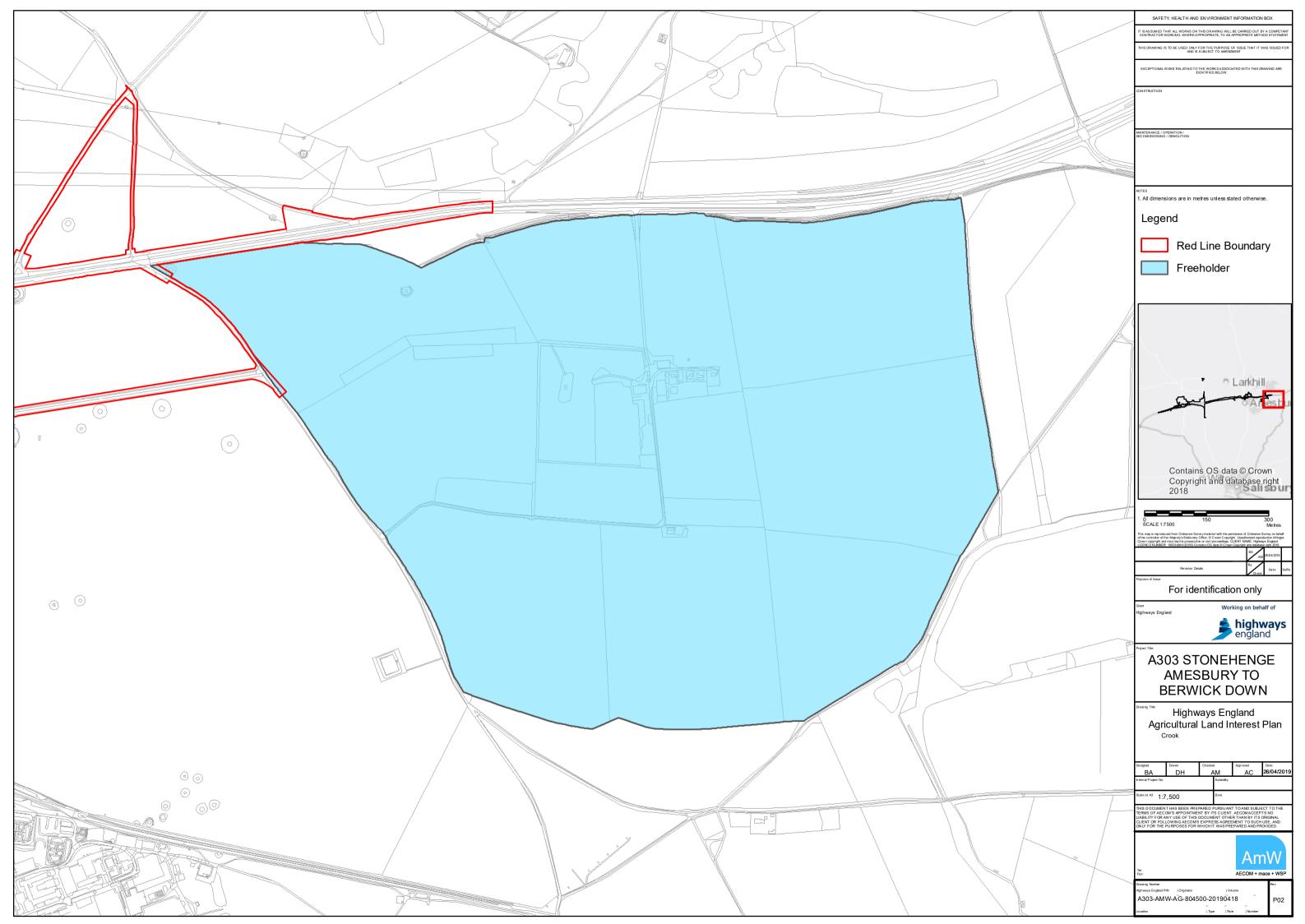


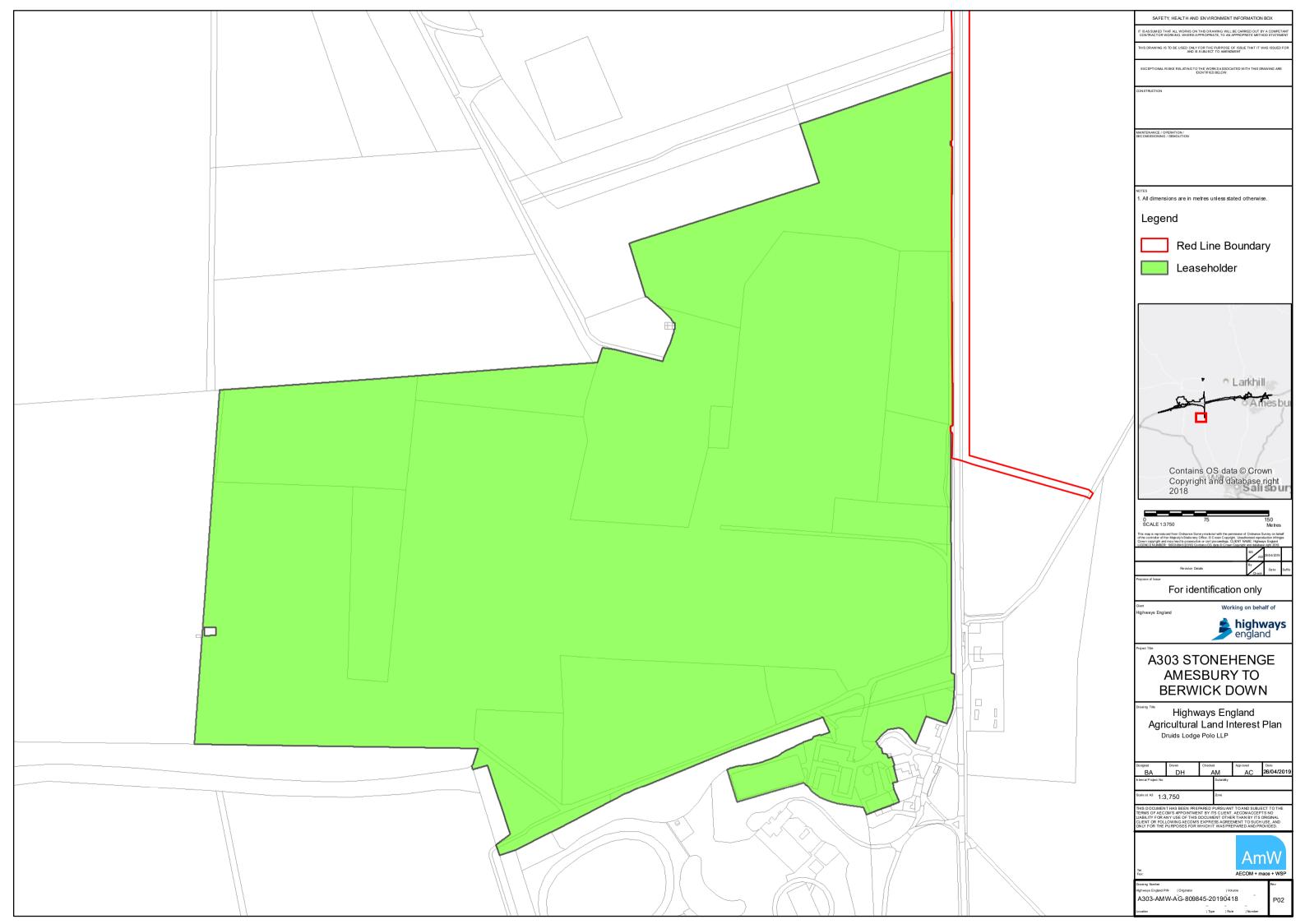


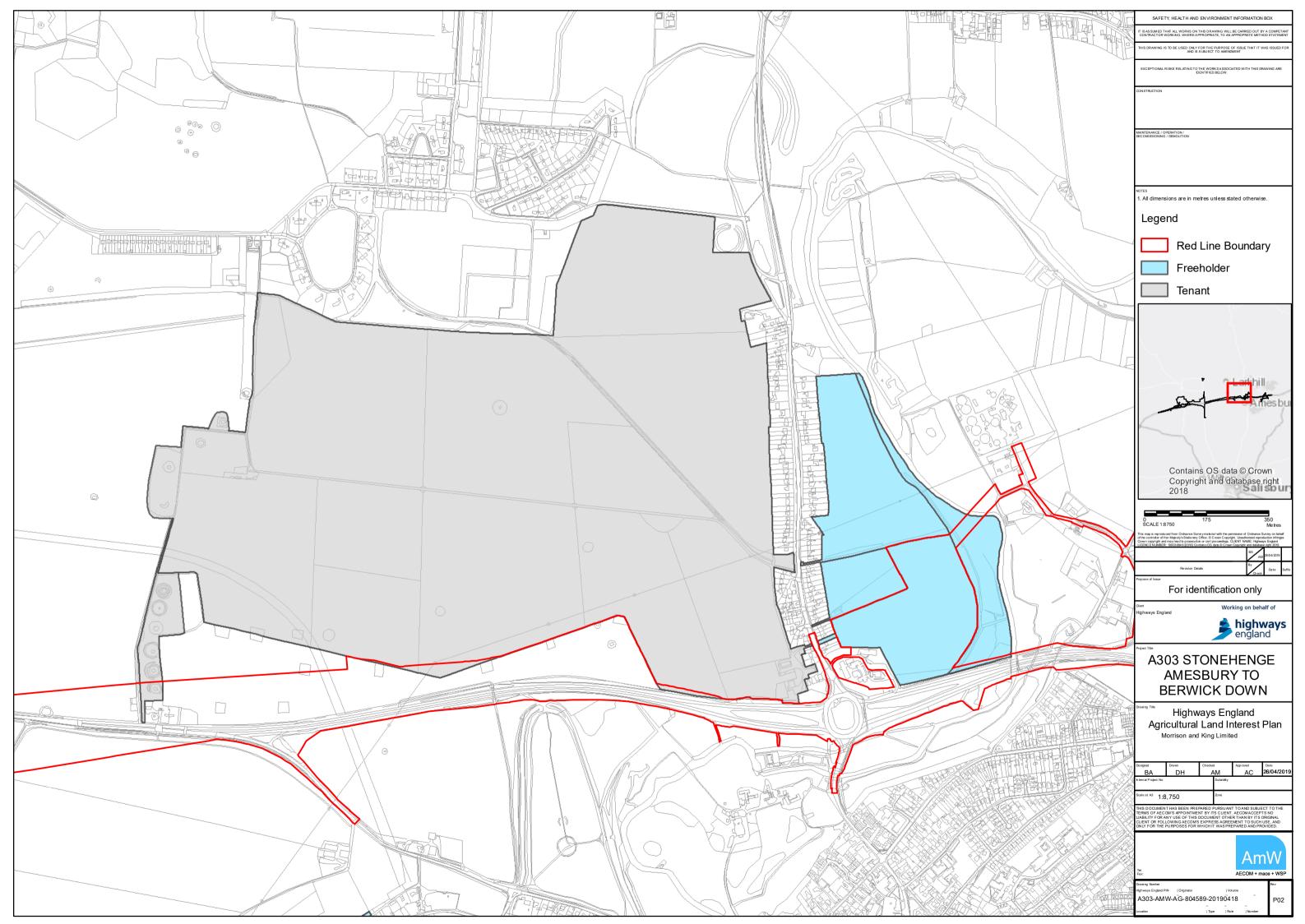


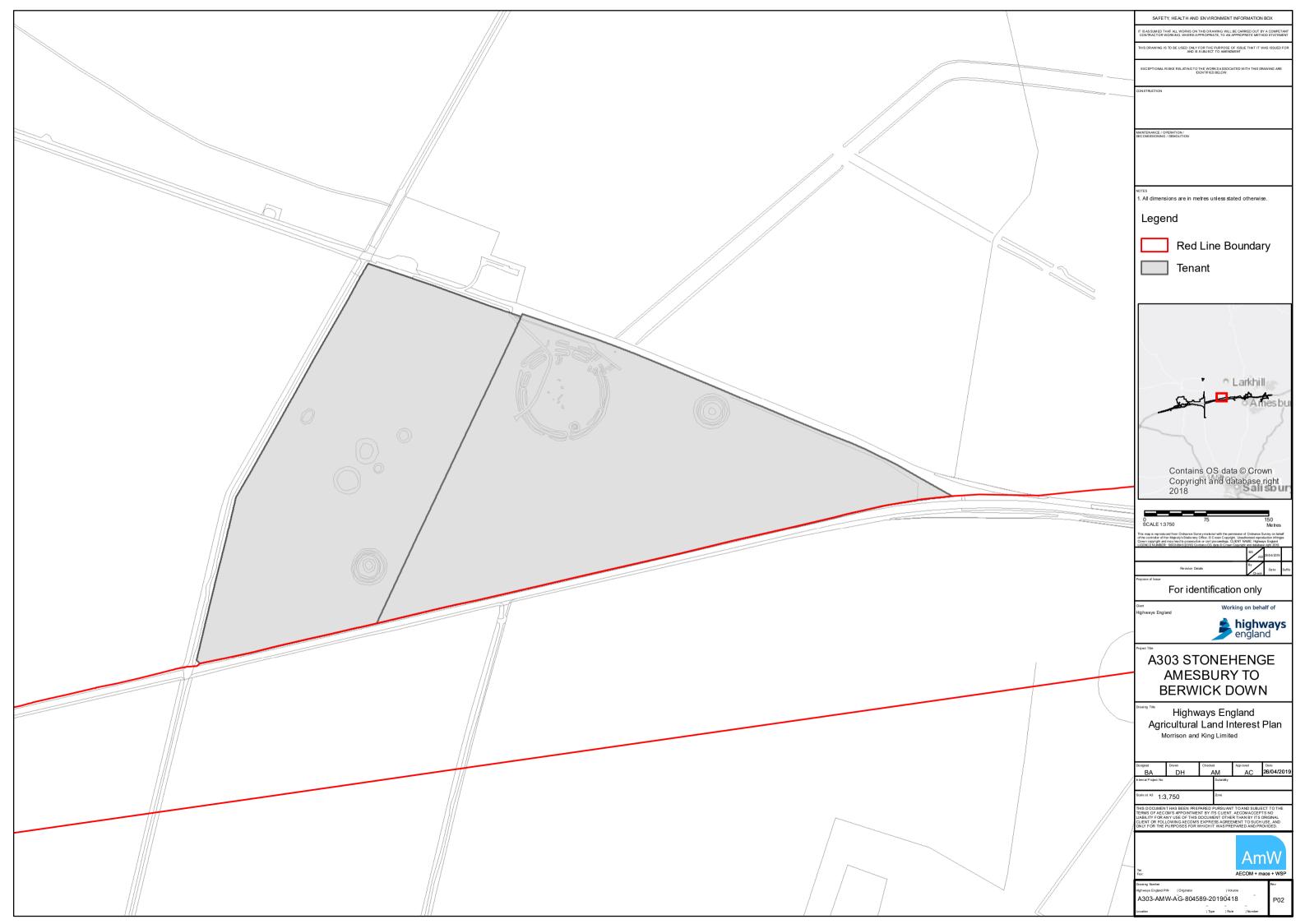


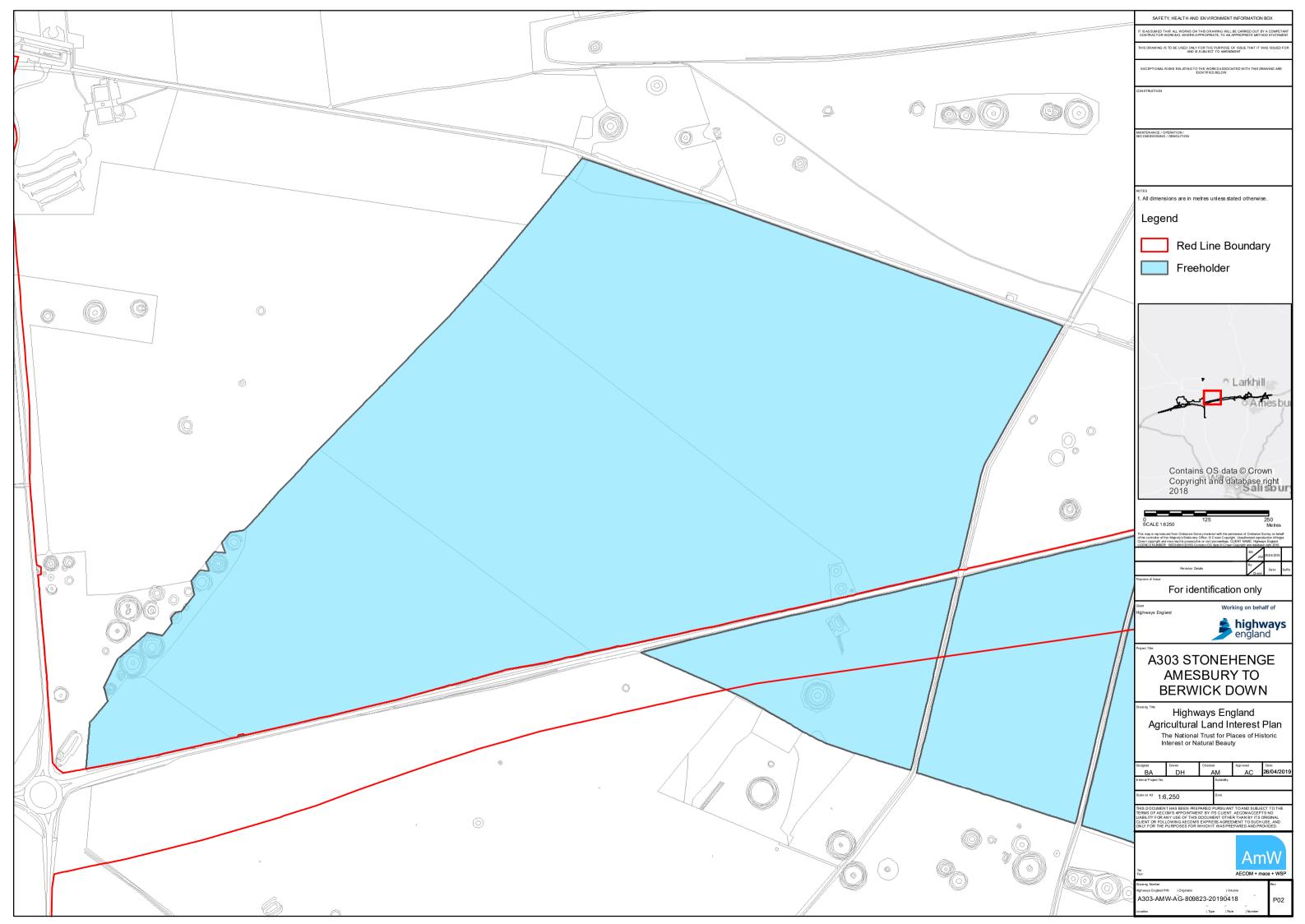


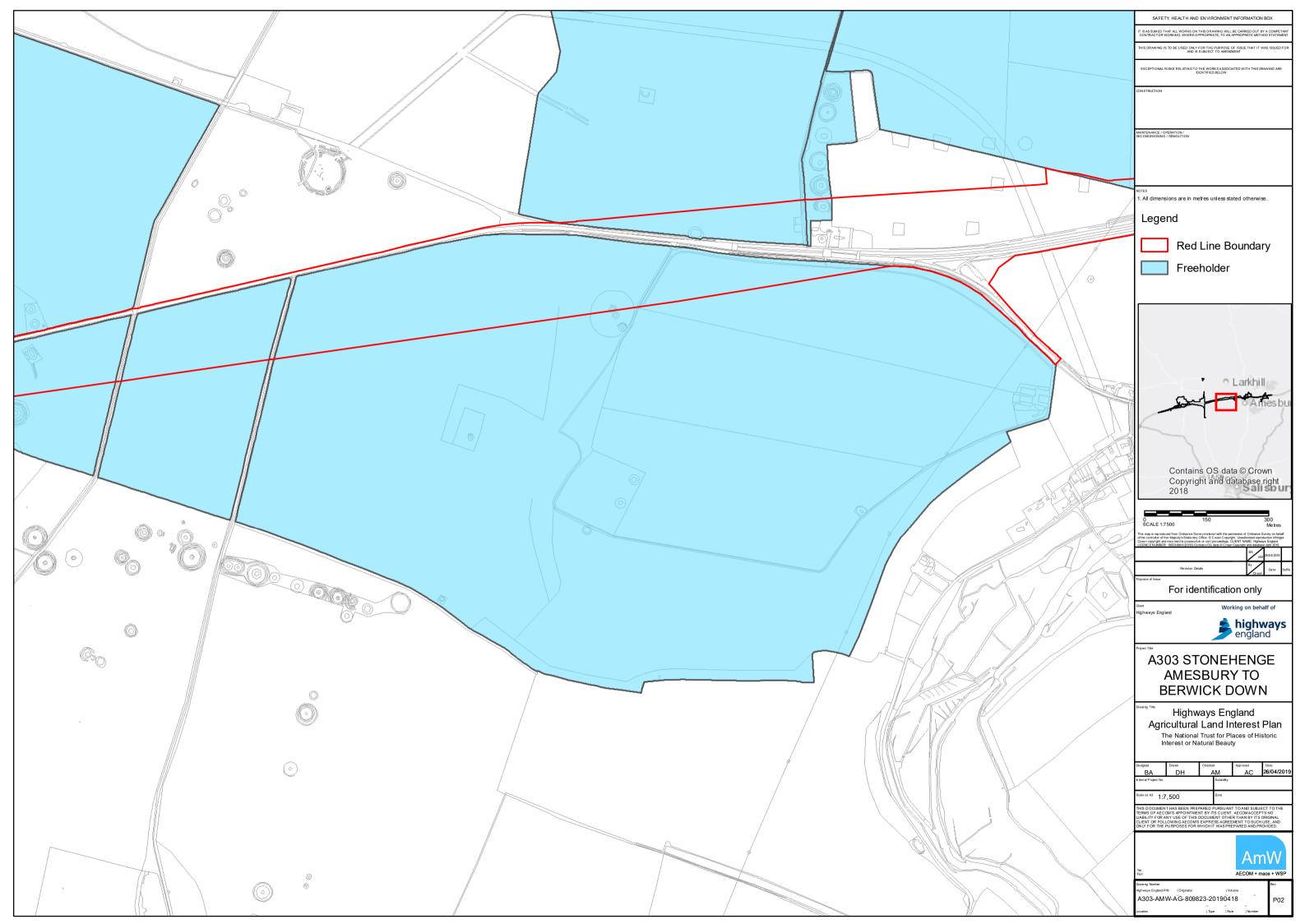


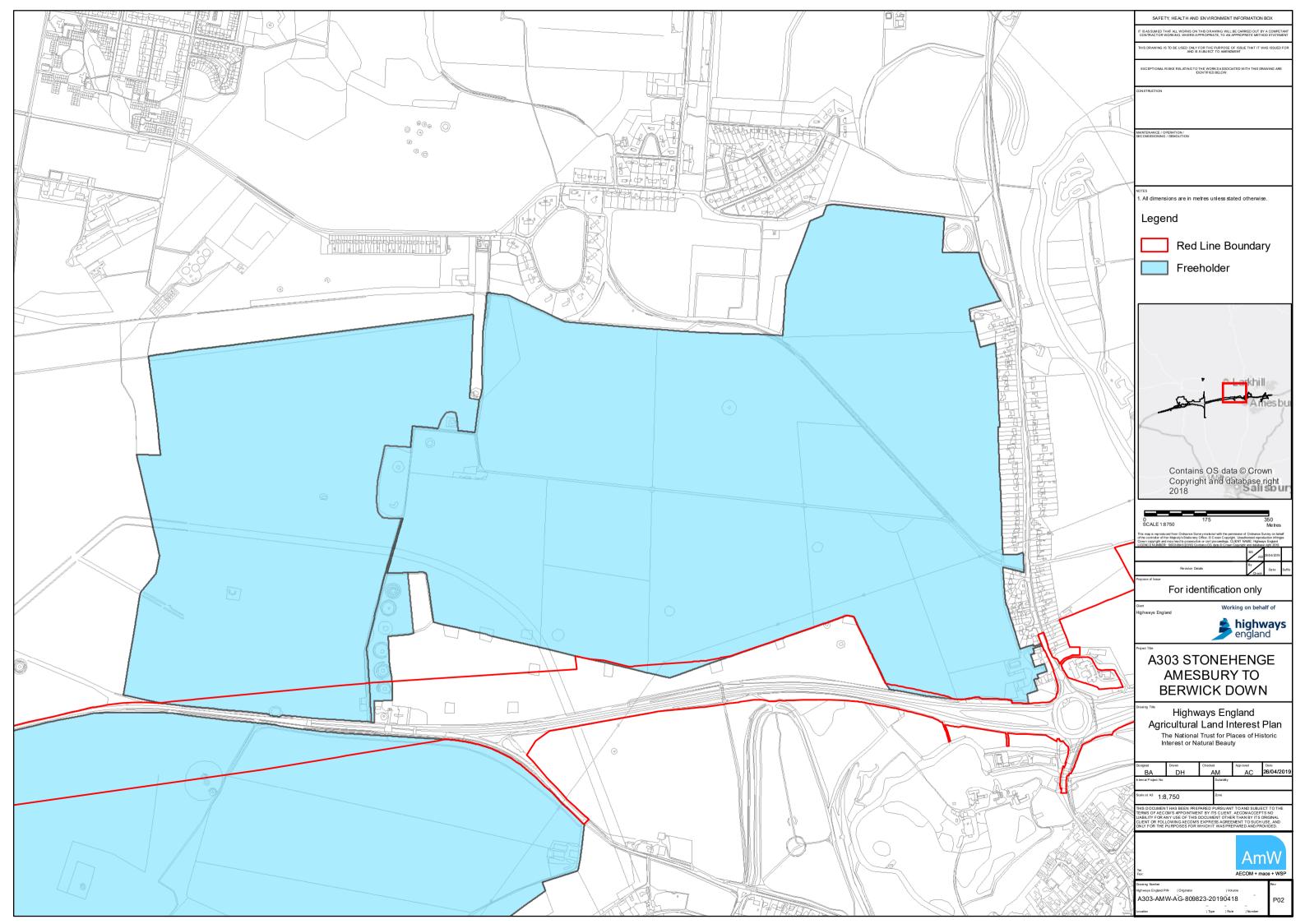


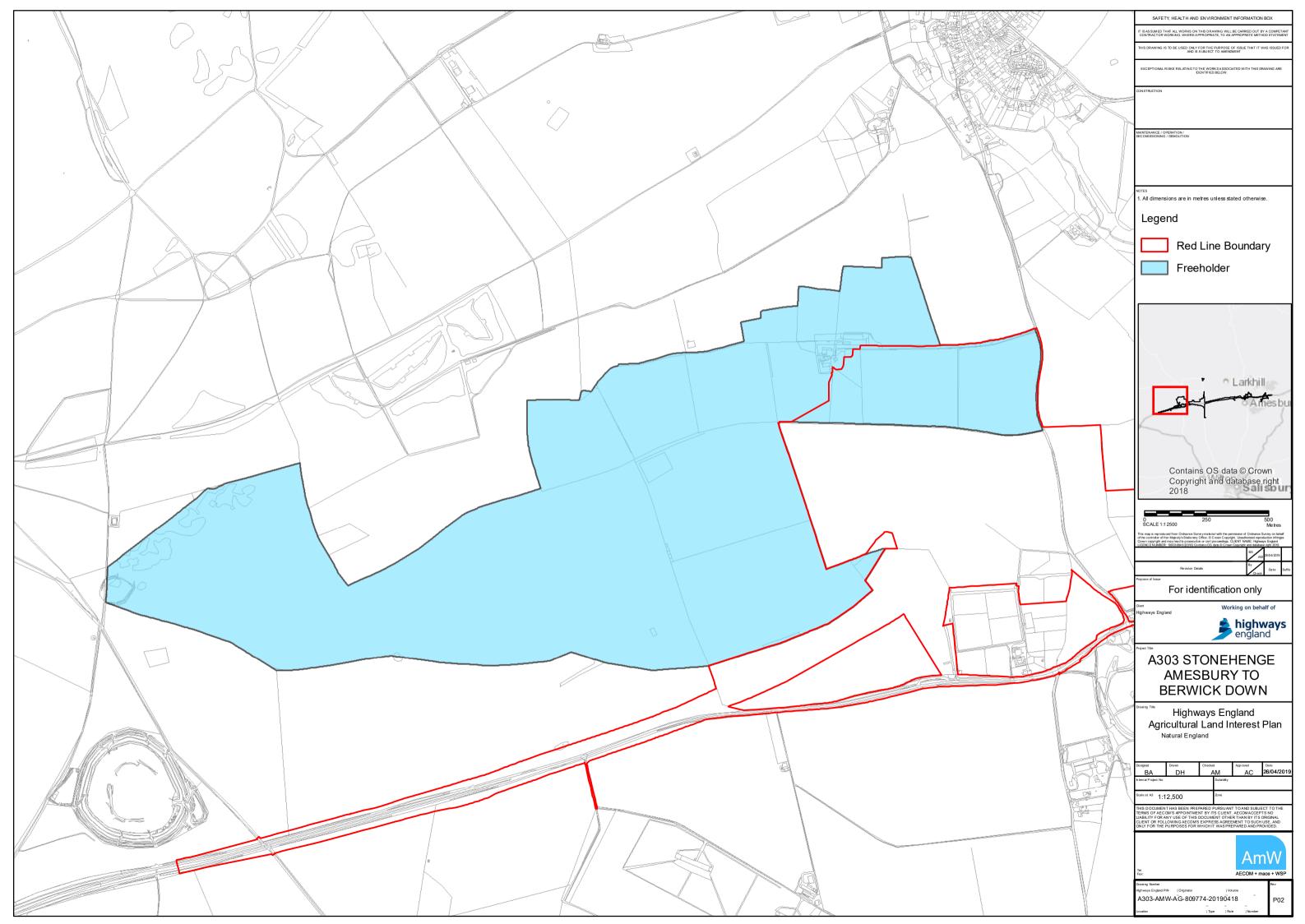


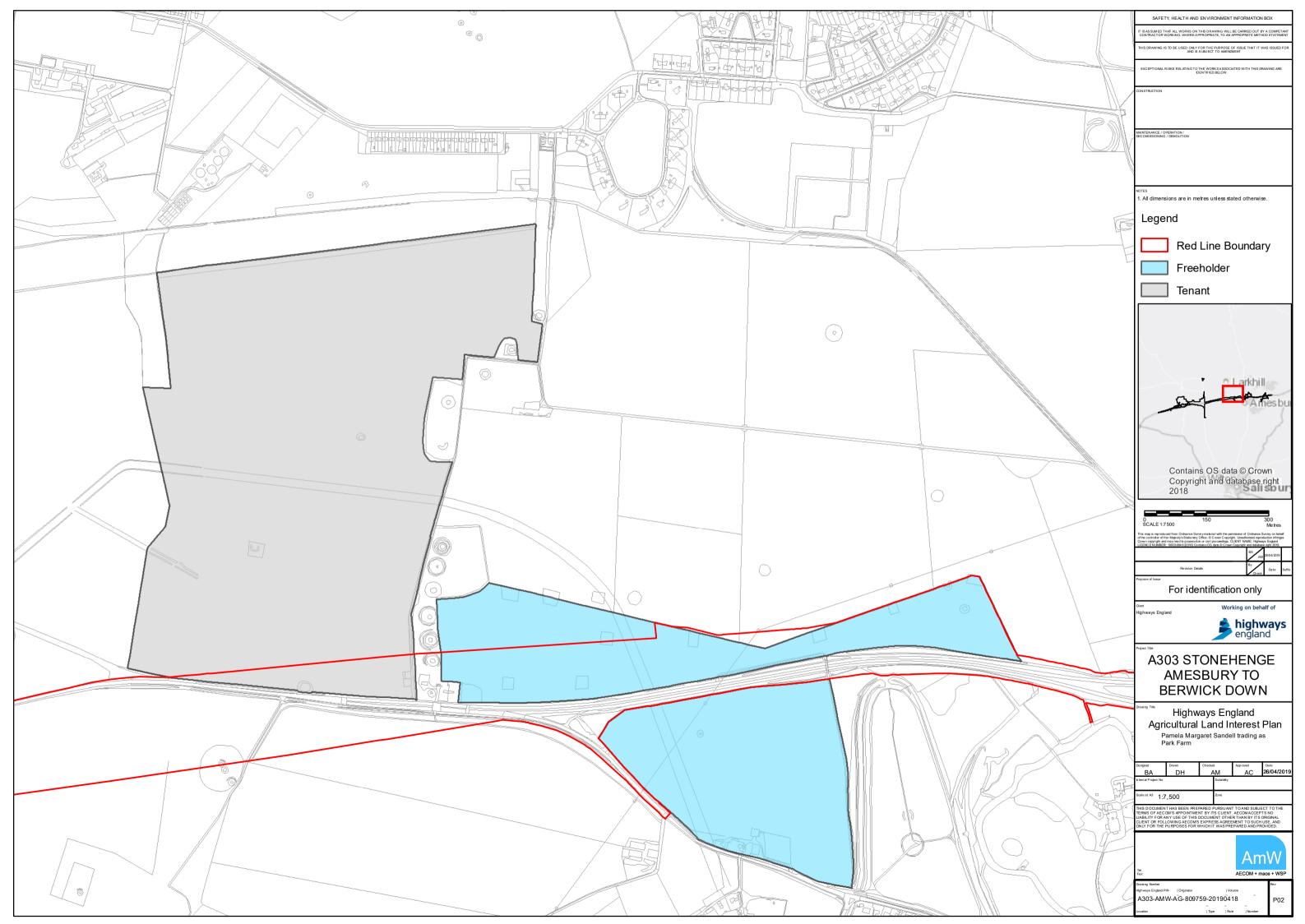


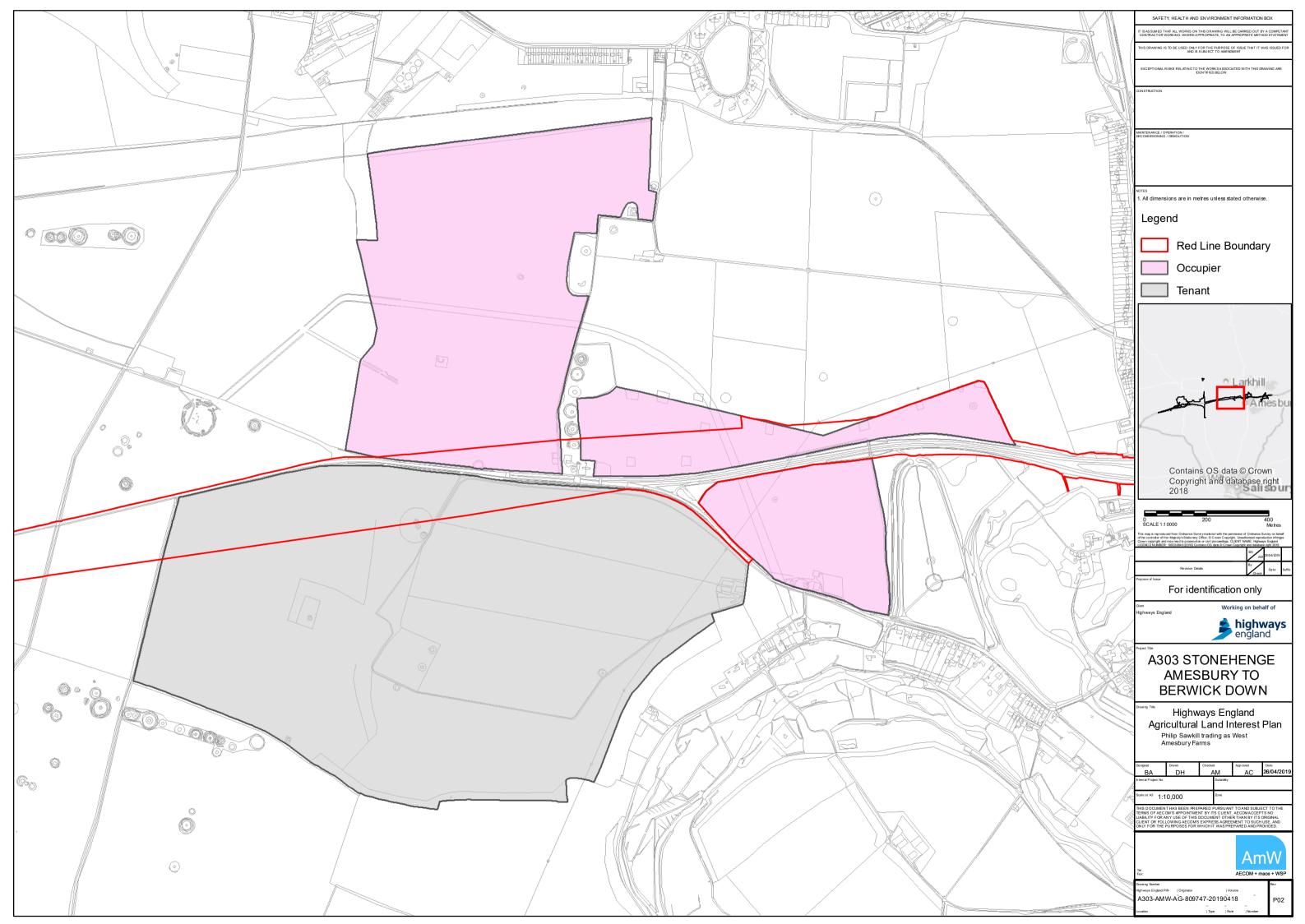


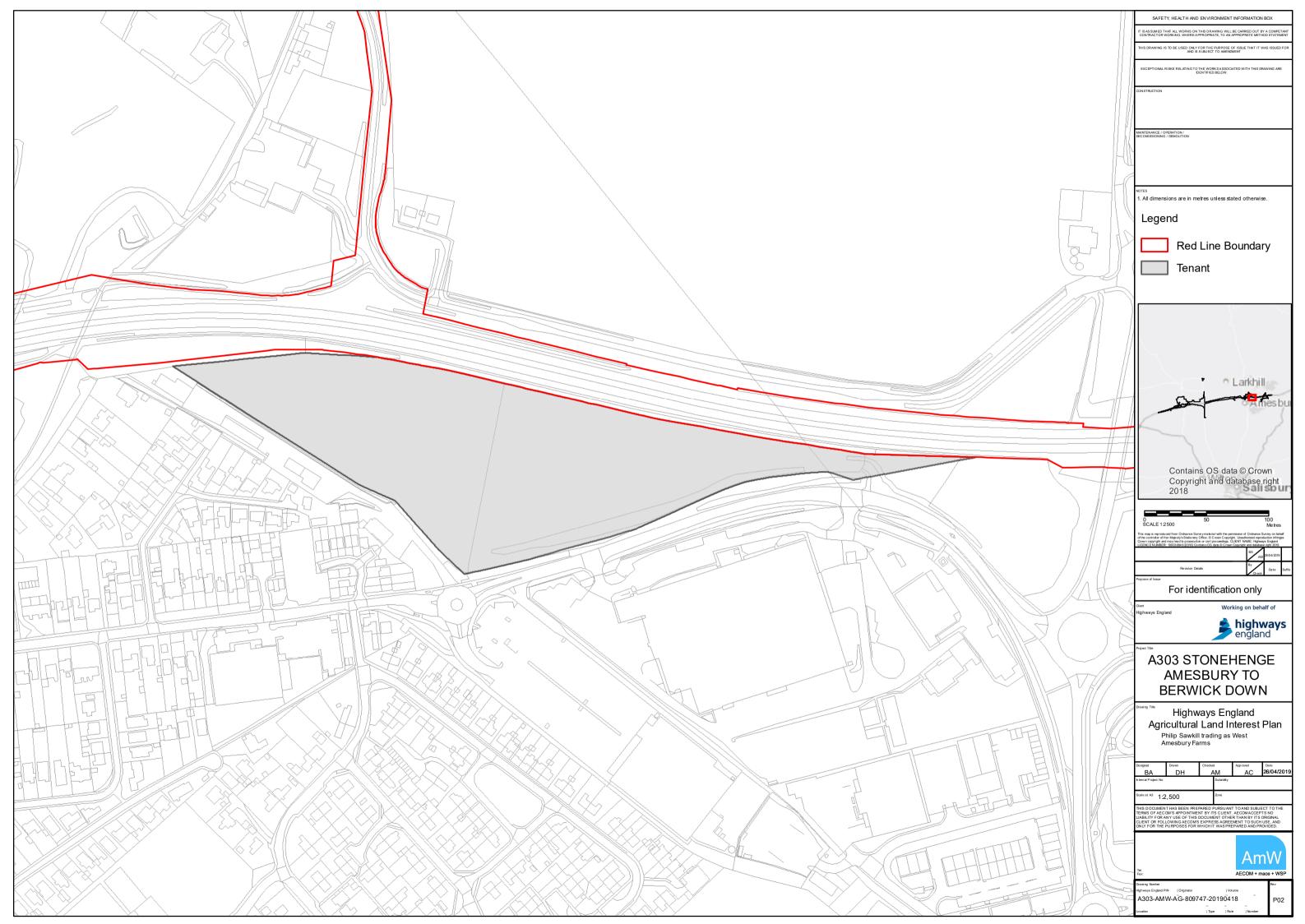


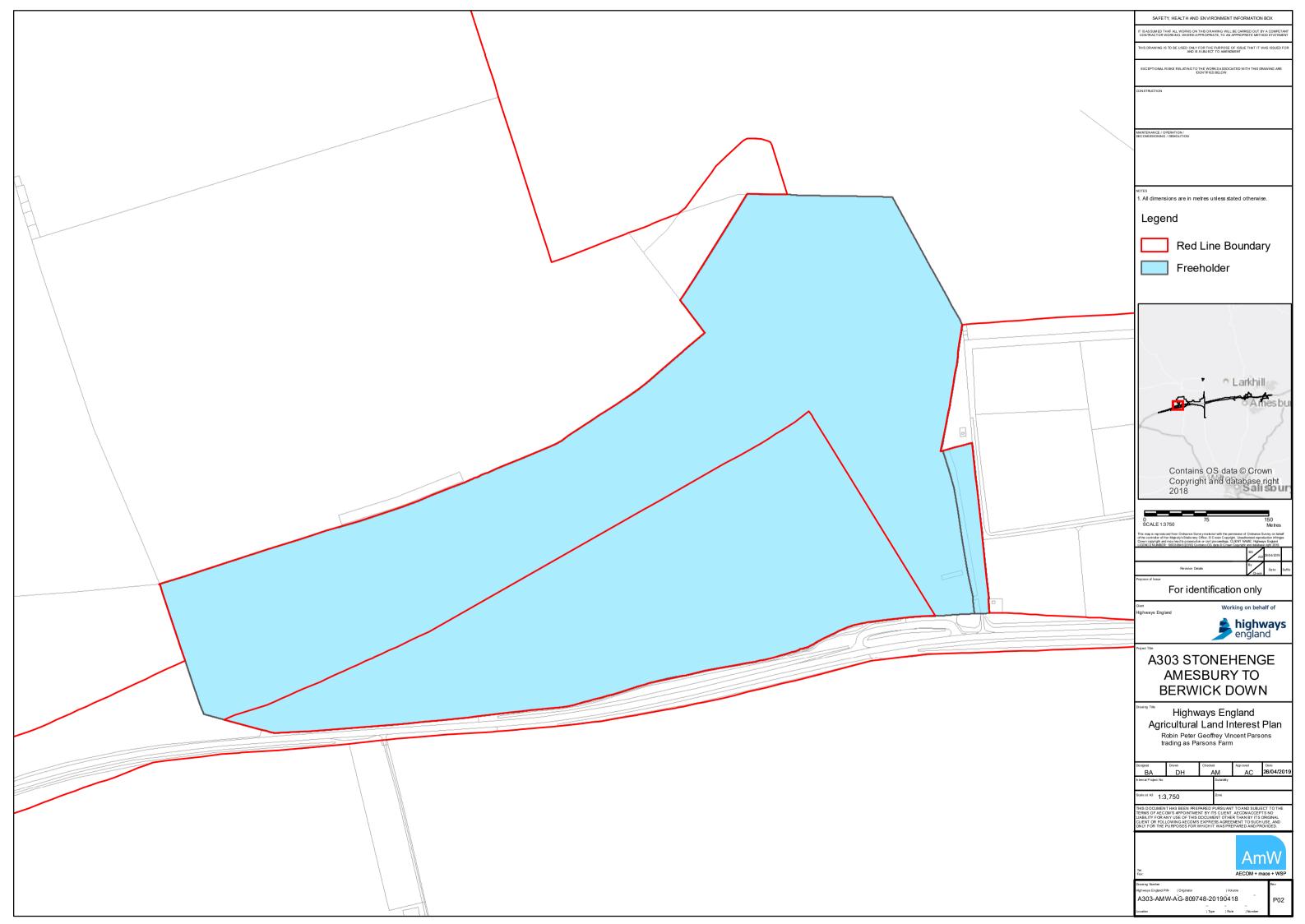


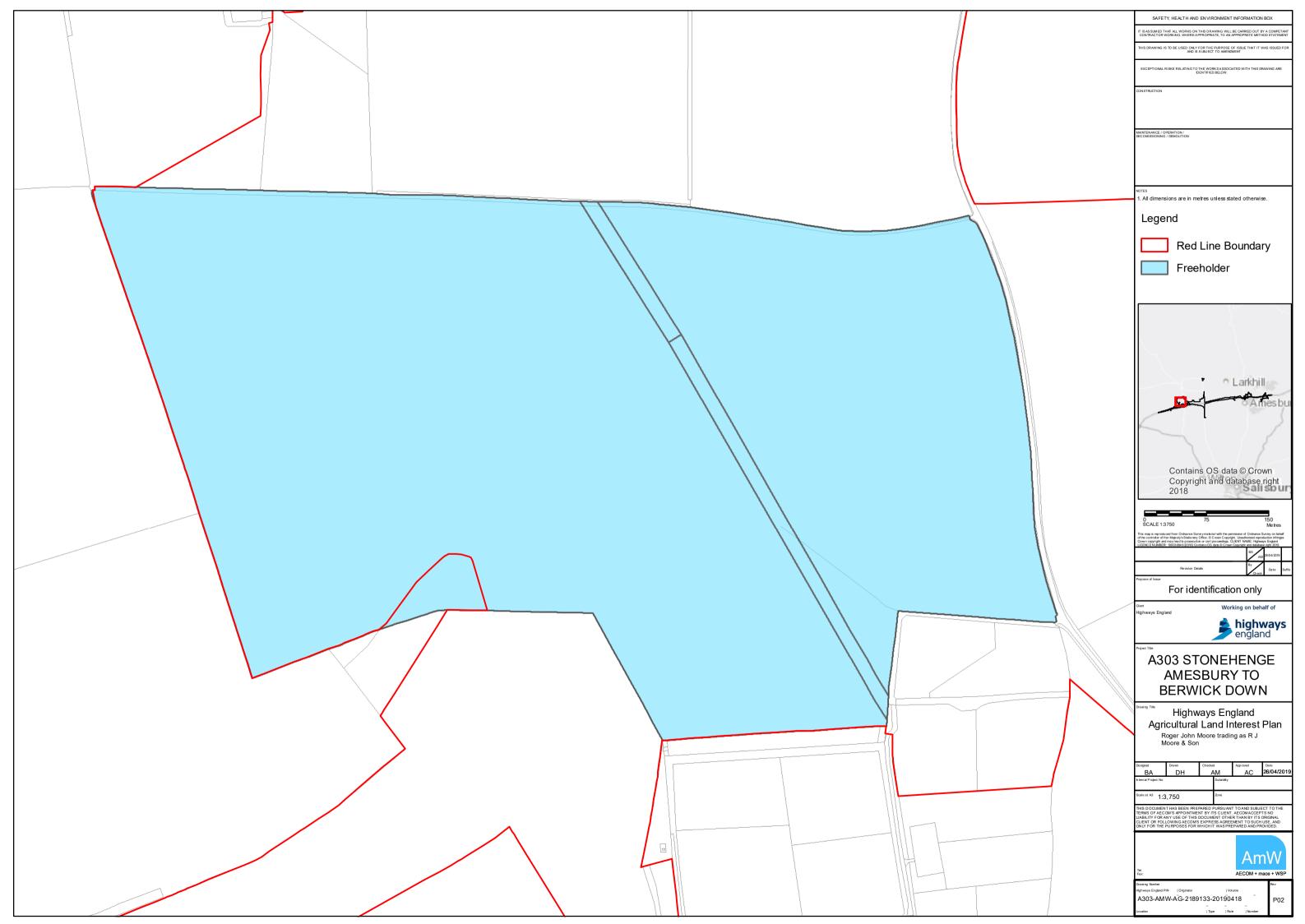


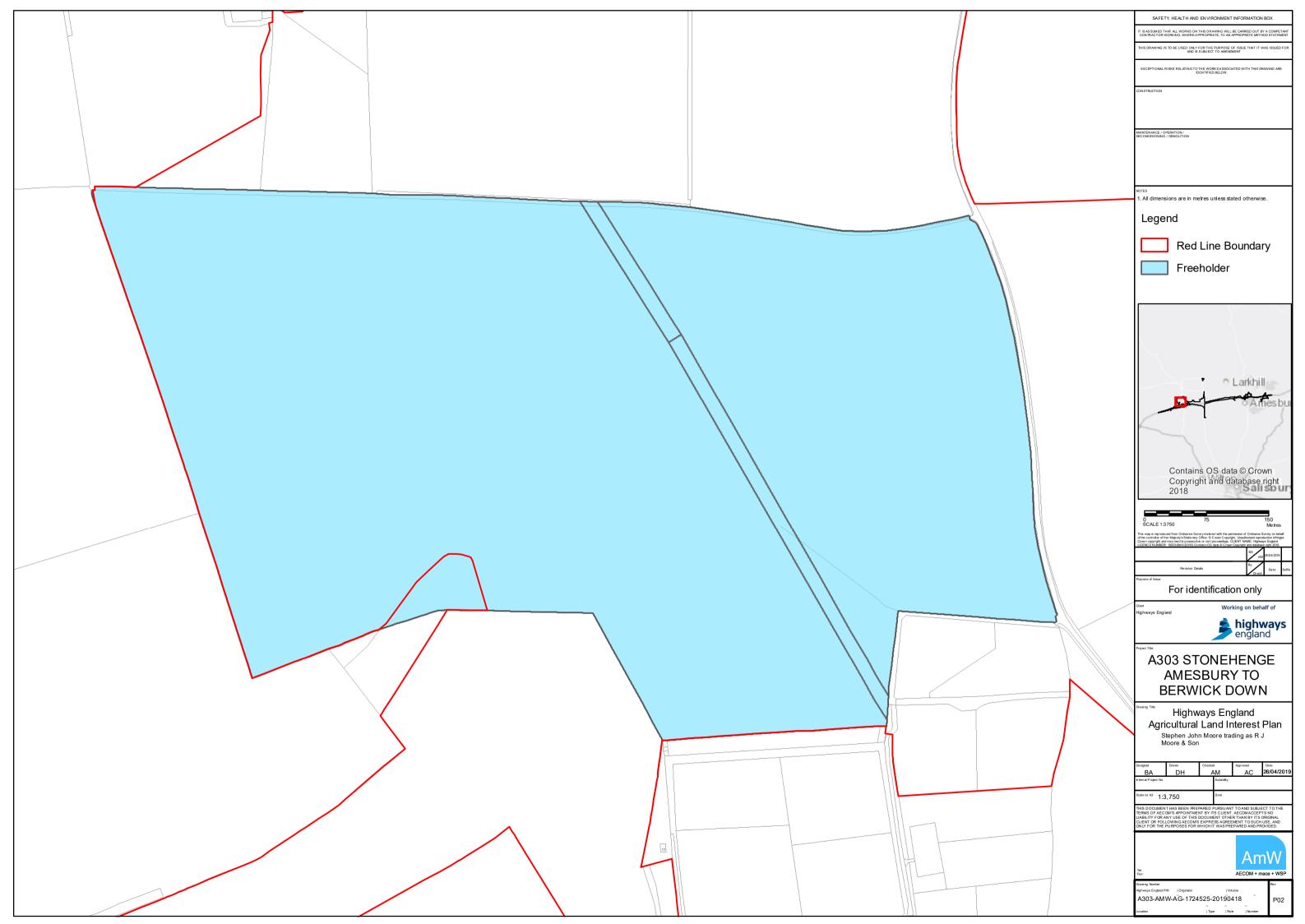


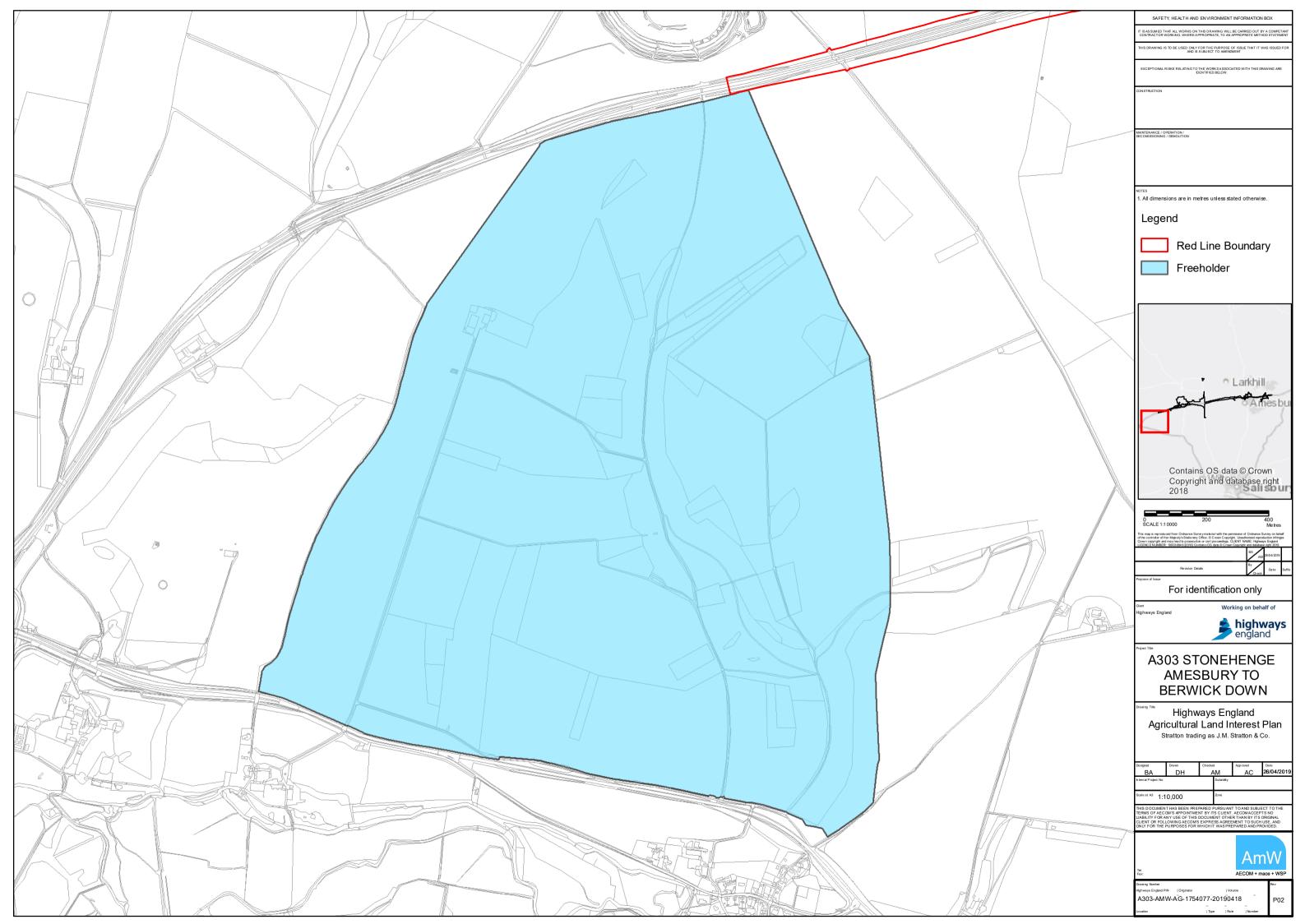


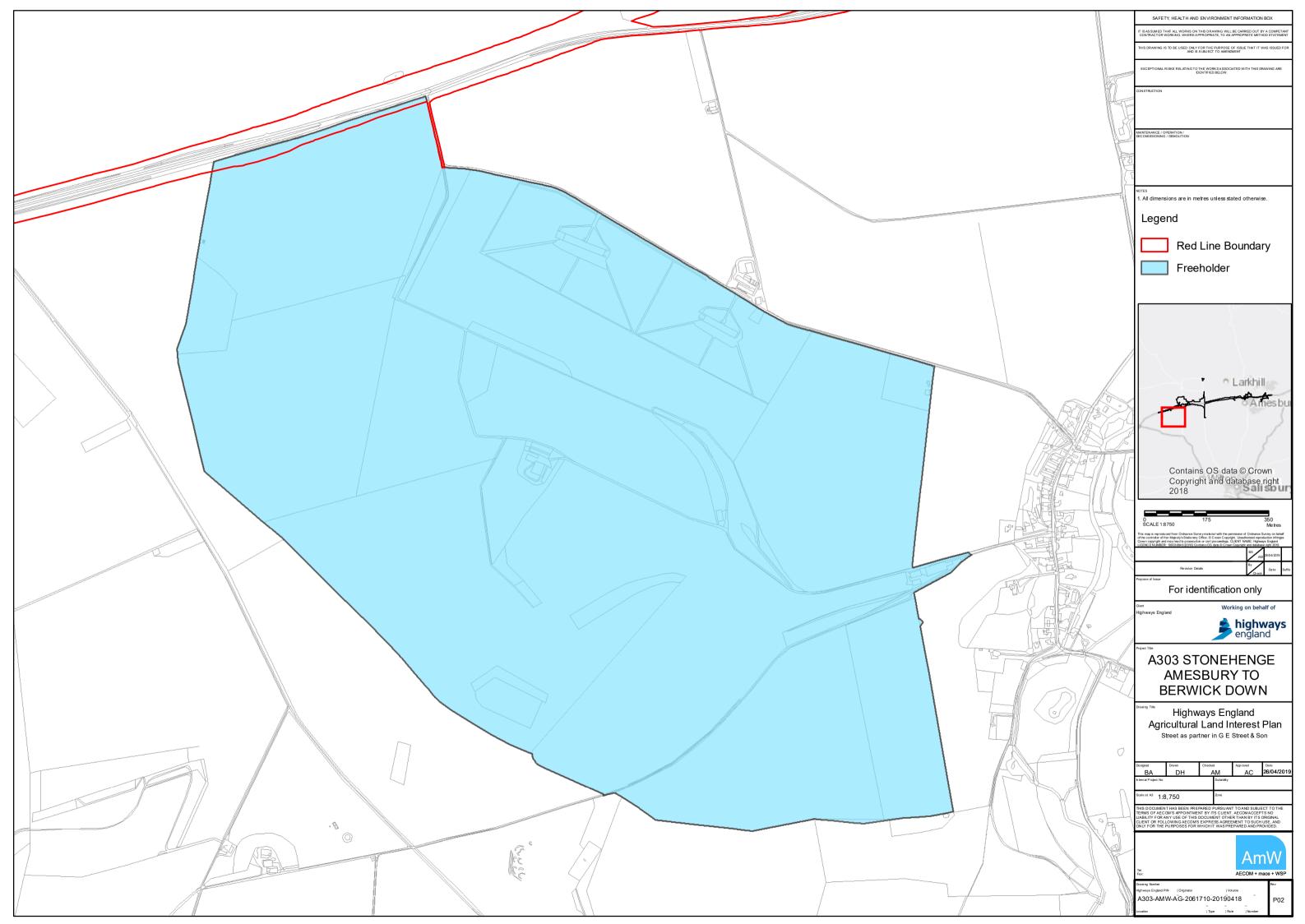




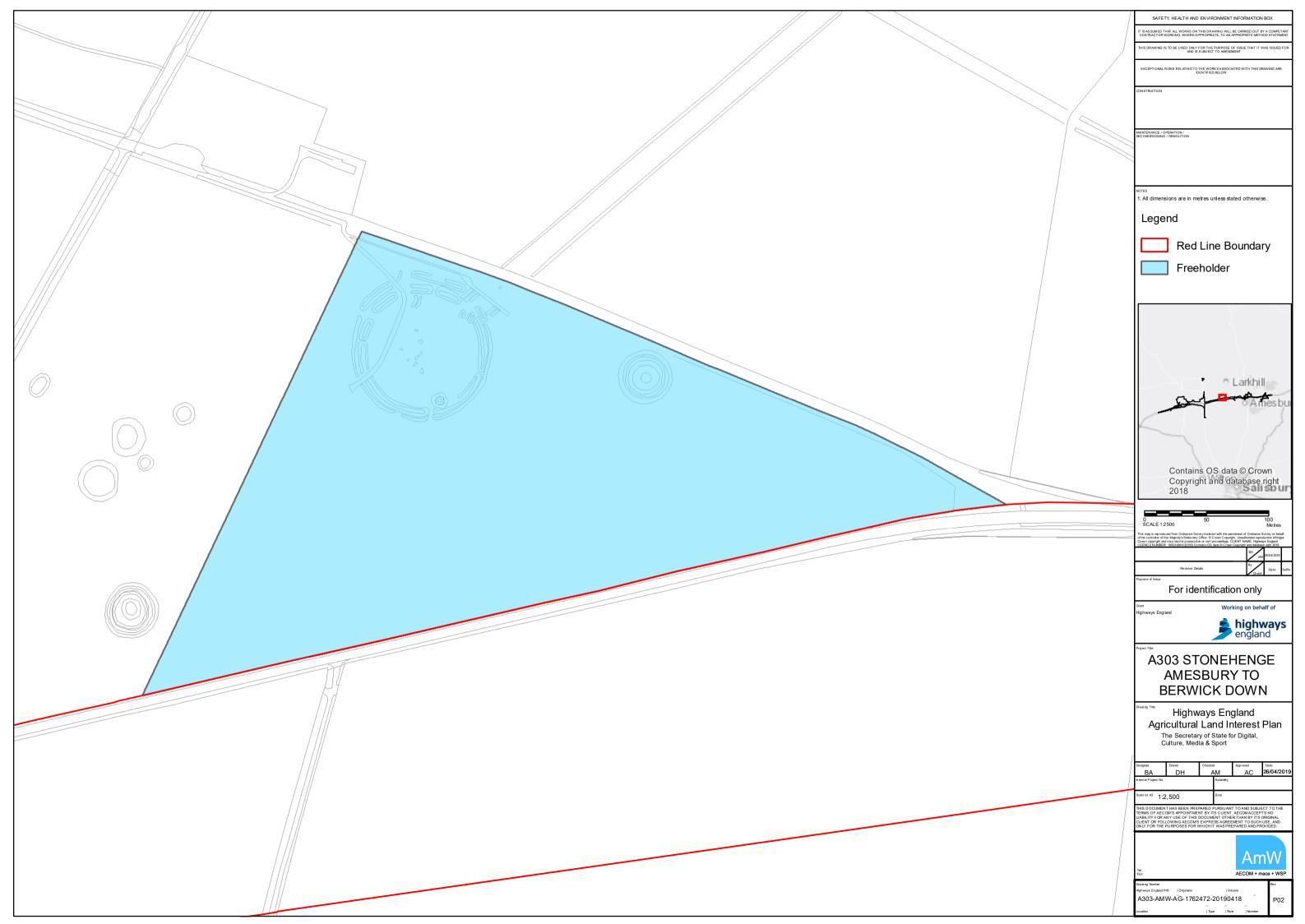


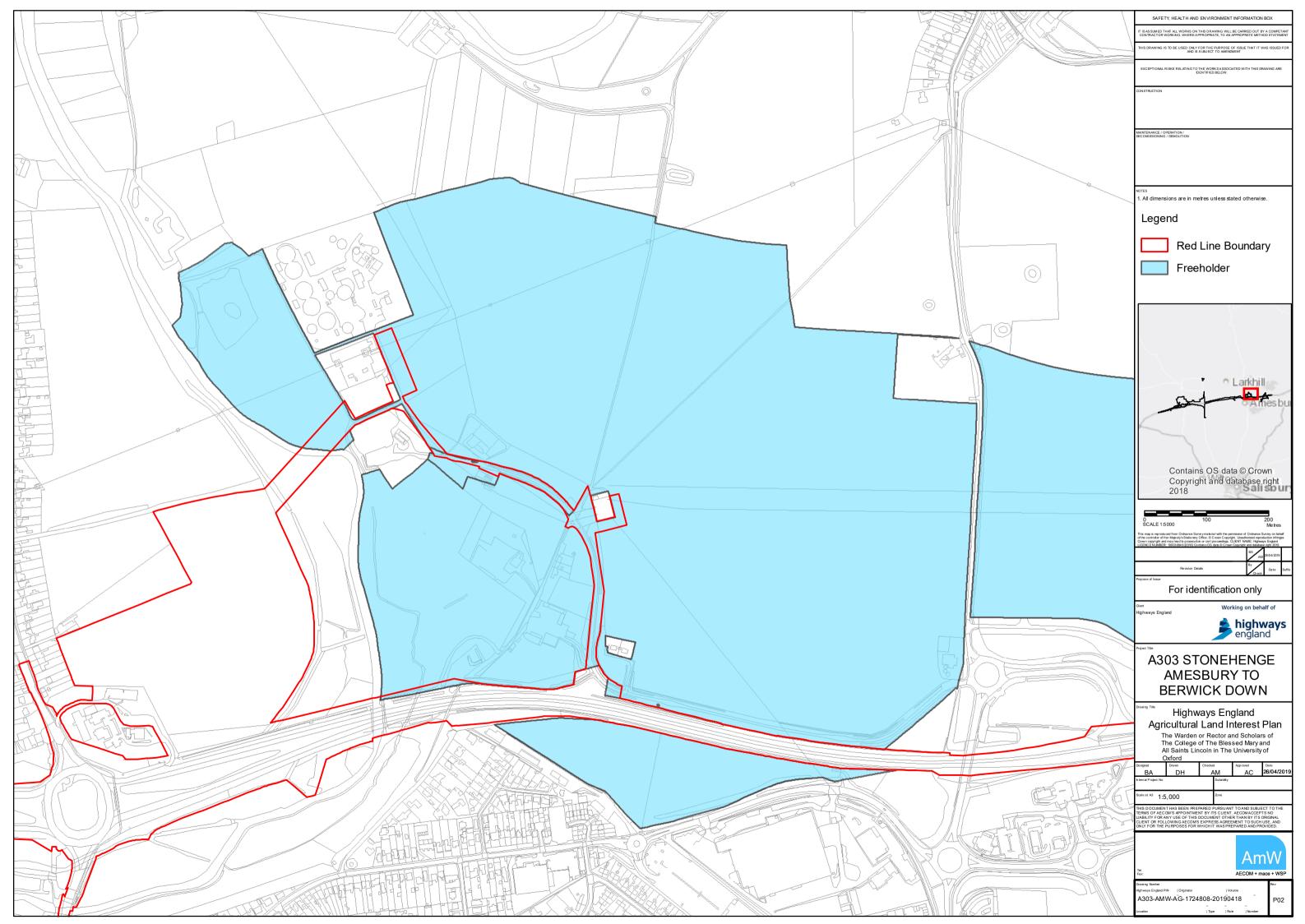


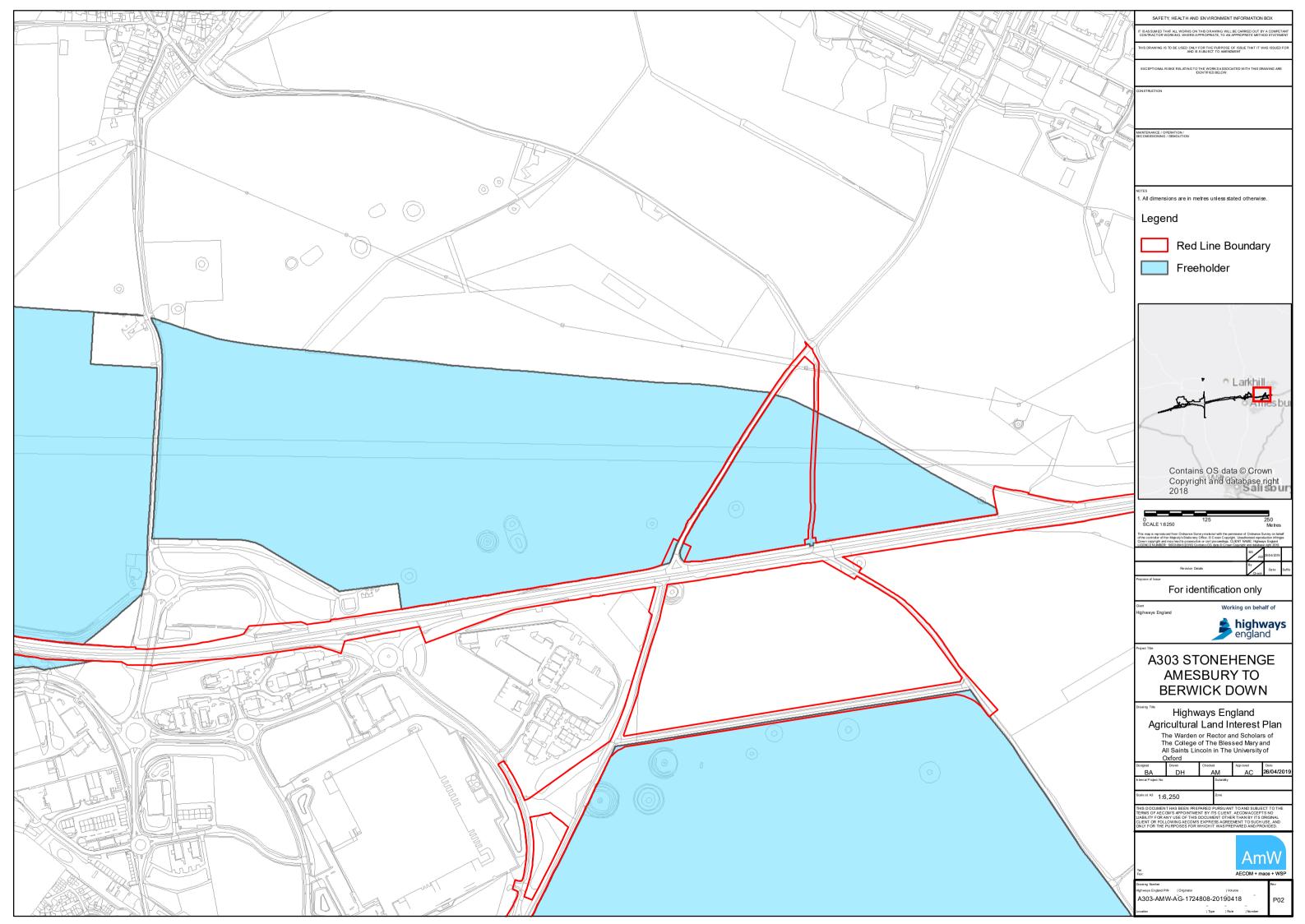


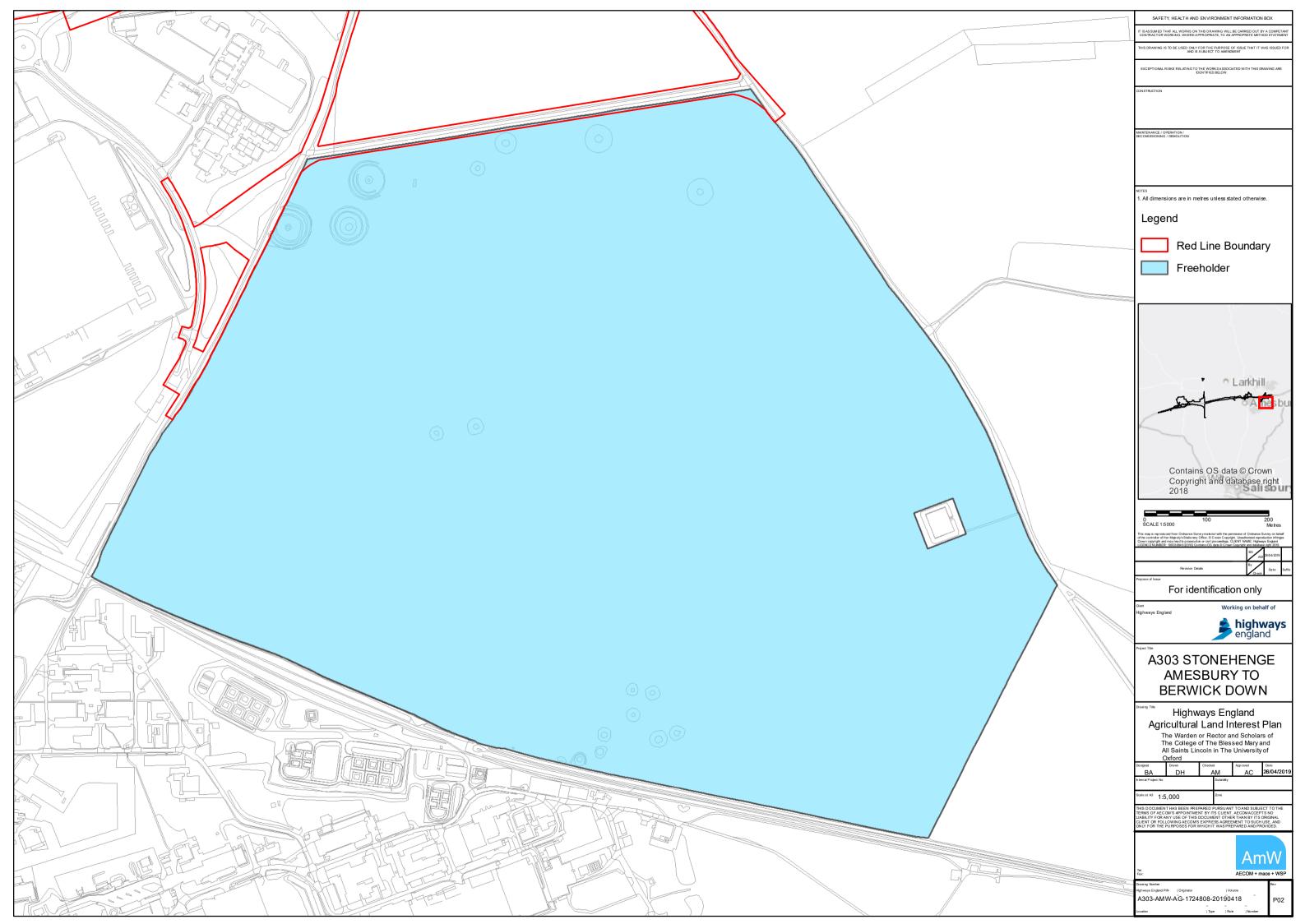


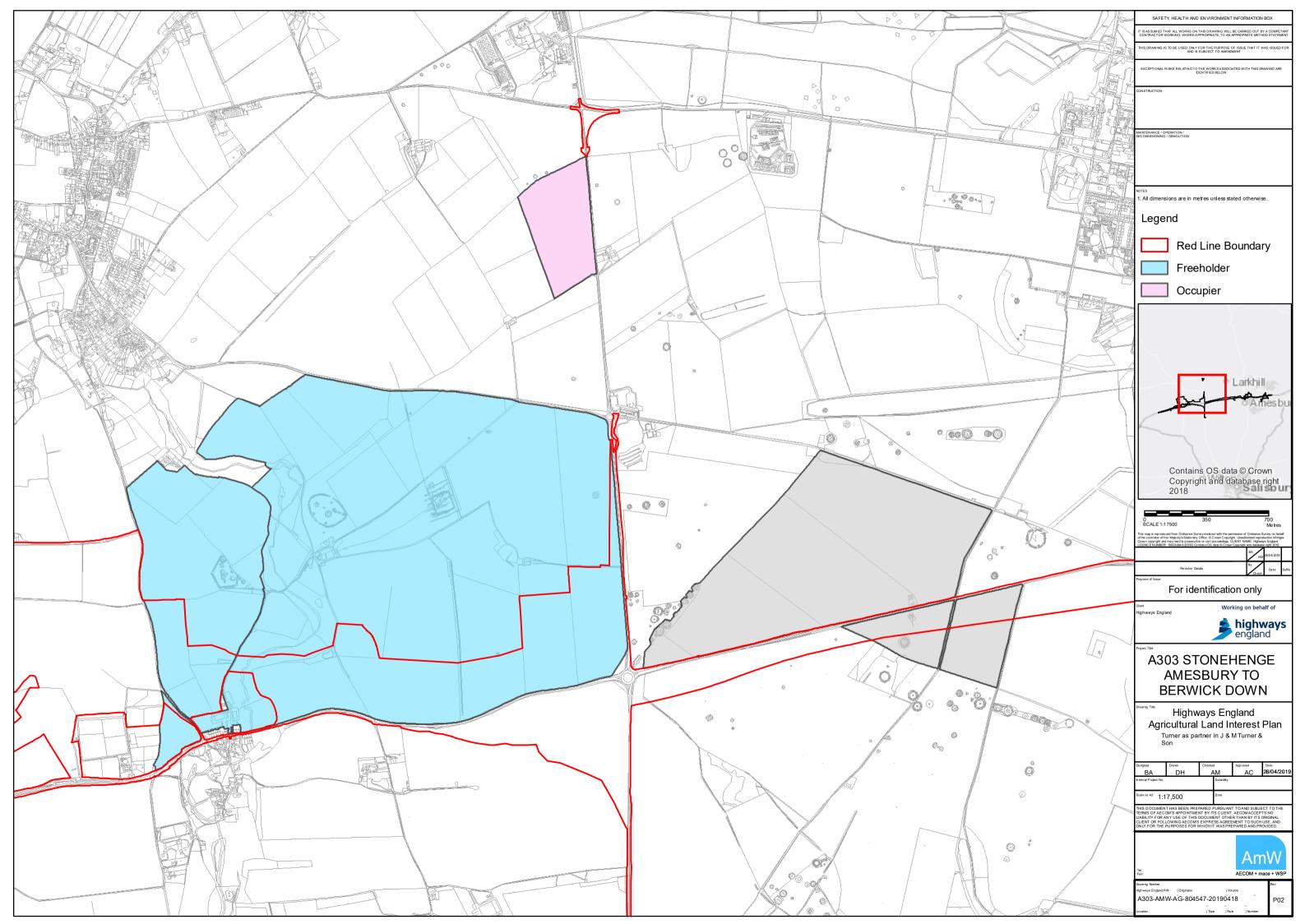


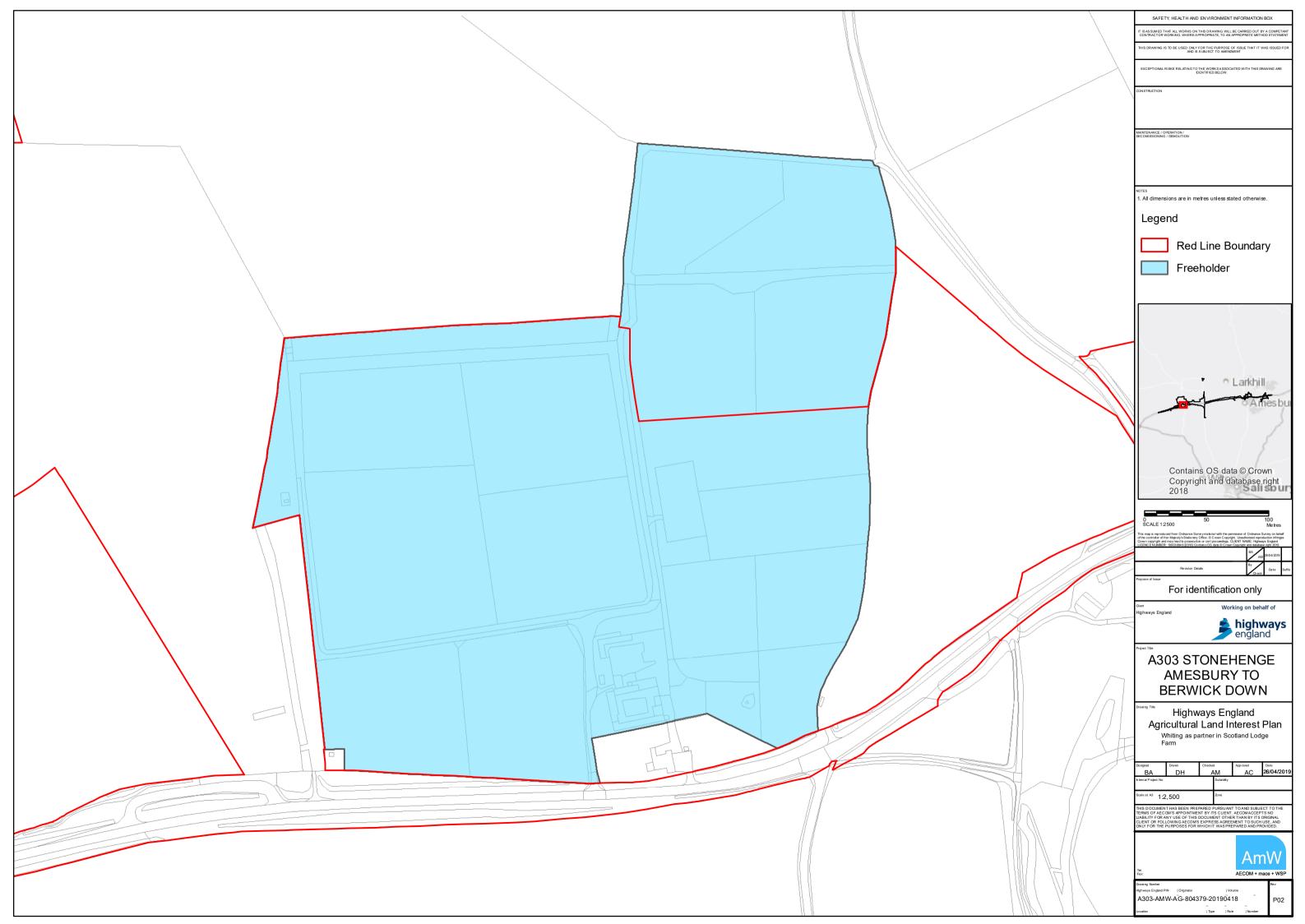
















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