



National  
Trust

**Responses to Examining Authority's 1<sup>st</sup> Written Questions**

**TR010025**

**Amesbury to Berwick Down (Stonehenge)**

**May 2019**

Question Number	Question to:	Question	Response
AL.1.33	Historic England, the National Trust and the Stonehenge Alliance	Please develop your RRs regarding alternatives including reference to the NPSNN, paragraphs 4.26 to 4.27, identifying any legal requirements and policy requirements set out in the NPSNN relating to the assessment of alternatives with which it is considered that the Applicant has failed to comply.	This concern has not been raised by the National Trust therefore we have no further comments.
CH.1.29	Historic England National Trust	<p>ES Appendix 2.2 OEMP</p> <p>Historic England have concerns that Table 3.2a (Specific Measures to apply to preliminary works) contains insufficient detail given the very high sensitivity of the proposal.</p> <p>Please provide details of additional specific measures which should be embedded in the OEMP and whether these could be contained in the DAMS.</p>	The National Trust shares this concern. We will provide comment on what should be further embedded in the OEMP and how this relates to the DAMS when we see the version of the DAMS that we understand will be submitted by the Applicant at Deadline 2.

<p>CH.1.47</p>	<p>Applicant National Trust</p>	<p>6067: Countess Farmhouse, grade II and associated buildings</p> <p>The view of the roundabout to the south, including the new flyover, would be opened up because of the felling of mature trees to enable drainage works.</p> <p>How effective as screening would be the current replanting proposals for a belt of trees within the Farmhouse land, how long would the trees take to achieve maturity, and what progress has been made towards agreement on a replanting scheme?</p>	<p>The National Trust are still awaiting the following:</p> <ul style="list-style-type: none"> <li>• details of the proposed planting strategy e.g. location, size, species</li> <li>• details of the proposed archaeological mitigation strategy – the National Trust would require archaeological evaluation, followed by archaeological mitigation comprising a 100% sampling strategy for the excavation of anthropogenic features; together with a plough soil sampling strategy commensurate with the rest of the scheme (to be defined within the draft DAMS), and appropriate to the results of the archaeological evaluation mitigation strategy for the full width of the proposed planting (and resulting root spread).</li> </ul> <p>In the absence of the above it is difficult to make any judgement about effectiveness.</p> <p>In terms of the question of maturity this will be dependent on species, the age of the trees at the time of planting and provision of appropriate aftercare to ensure successful establishment. On the basis that the National Trust would expect to see the planting of native species we have yet to be provided with evidence to support the reduction in the level of significant adverse impact by year 15.</p> <p>Further to the above, even with the optimum tree belt we still believe there will be significant adverse impact on Countess Farm because:</p> <ul style="list-style-type: none"> <li>• the level of noise reduction provided by tree planting is dependent on a number of factors including the species, structure, width of tree belt and density of understory. For a noise reduction of up to 6dB a high density tree and shrub barrier of between 20-30m is required (Dobson &amp; Ryan 2000). A tree belt of sufficient width to achieve this level of reduction will not be possible given the sensitive nature of the site and proximity of the buildings to the road infrastructure</li> <li>• the tree belt will not be able to mitigate:             <ul style="list-style-type: none"> <li>○ the impact of the road closest to the buildings (due to available space)</li> <li>○ the full height of the A303 flyover and associated slip roads.</li> </ul> </li> </ul>
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CH.1.49	Applicant Any other parties	<p><b>ES Additional Submission 2: Document clarifying the relationship between the archaeological mitigation strategy documents</b></p> <p>Para 1.2.3 (See also paras 1.2.5, 1.3.1, and 1.5.1)</p> <p>This para tells us that the DAMS will be developed in consultation with the HMAG, comprising Historic England, WCAS, the National Trust, and English Heritage. Elsewhere in the ES (See OAMS para 1.2.7, etc.), it is noted that the development and operation of the DAMS and subsequent documents will be carried out in agreement with these parties.</p> <p>The matter of agreement is a significant concern, which should be secured in the DCO.</p>	<p>We agree that this should be secured within the DCO. The clarity of control documents to be certified within the DCO, such as the DAMS, and the question of consultation upon and approval of material submitted post DCO confirmation is addressed in our Written Representation.</p>
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CA.1.4	National Trust	Please explain your concerns as regards the proposed LoD generally and in particular as regards the potential for variation in relation to the portal entrances.	<p>Our concerns with regards to the LoD are as follows:</p> <ul style="list-style-type: none"><li>• while the increase in length of the bored tunnel has the potential to have positive beneficial impacts for the WHS in further mitigating adverse visual impacts on attributes of OUV, The Applicant has not explicitly assessed the impacts of this change, or submitted any evidence to demonstrate there would be no adverse impacts on OUV</li><li>• we are also concerned that the wording that is currently used would allow for the removal of the cut and cover extension at the western end of the tunnel should the bored tunnel be extended by up to 200m. While the length of the tunnel would ultimately remain the same in this scenario the removal of a cut and cover extension would have the following disadvantages (both of which could have a significant adverse impact on OUV):<ul style="list-style-type: none"><li>○ a bored tunnel face is likely to be 14m deep (as opposed to, more likely, a 9m deep entrance at the end of the cut and cover extension) making the tunnel entrance more prominent and visually intrusive in the landscape</li><li>○ there would be less opportunity to hide the associated tunnel infrastructure (e.g. portal control buildings) making the scheme more visually intrusive in the WHS landscape</li></ul></li><li>• we are also concerned that resultant engineering requirements affecting changes in vertical road alignment (and therefore depth of cut), or positioning of the area of land take (and any consequent change to direct physical impacts on archaeology) are not set out, nor their impacts assessed. We are concerned that there may therefore be additional direct physical impacts on the OUV of the WHS.</li></ul>
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<p>CA.1.5</p>	<p>National Trust</p>	<p>Please expand upon your concerns as regards the scope for restrictions to be imposed upon the use of the land above the tunnel.</p>	<p>The Applicant requires the imposition of restrictive covenants over the subsoil above the tunnel (and its exclusion zone), up to and including the surface of the land above. The purpose of this is to secure protection of the tunnel.</p> <p>While we recognise the engineering and safety requirements that make a tunnel protection zone necessary, such covenants could compromise, and potentially prevent, both future research within the WHS, and also works necessary to the conservation and protection of sites and monuments that convey its attributes of OUV.</p> <p>The proposed extents and exact locations where various restrictions would apply are yet to be finalised. The conditions proposed at present are overly restrictive, and would for example prevent open area excavation and any excavation below 1.2m, thus compromising a researcher’s ability to ensure the most appropriate fieldwork methodology is used.</p> <p>In addition to this, we are concerned that within an archaeological WHS there should be an appropriate process in place to ensure that neither the condition of archaeological sites and monuments, nor the potential for enhancing understanding of the WHS are compromised, and that the process should be agreed by the National Trust and HMAG and secured within the DCO. The proposed restriction to allow access only for road legal vehicles would also mean that mini-diggers and JCBs would not be able to access these areas. This would prevent not only their use for instance in archaeological excavations but also for fence replacements, works relating to replacement of utilities (public and private, e.g. underground pipes feeding water troughs etc.).</p> <p>Without appropriate and proportionate restrictions and an appropriate process, we believe that that the proposed approach could compromise our (and others’) ability to protect the OUV of the WHS.</p> <p>In relation to this we are also concerned that the inclusion of National Trust land within Order limits for survey and monitoring removes the ability to ensure the conservation and protection of archaeological sites and monuments that are not Scheduled Monuments, but which convey the OUV of the WHS.</p> <p>This is an area the Trust considers likely to be apt for consideration in Protective Provisions, to be discussed in detail with the Applicant.</p>
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DCO.1.95	Applicant	<p>Requirement 4 – Outline Environmental Management Plan</p> <p>The OEMP, Table 3.2b (D-LAN2), provides a commitment that the provision of fencing and surfacing within the WHS shall be developed in consultation with the National Trust, Historic England, English Heritage, and Wiltshire Council and approved by The Authority.</p> <p>Should this be the subject of a specific Requirement in the dDCO?</p>	<p>We agree that this should be the subject of a specific requirement, and as per the response in our Written Representation, we are expecting to see updates within the OEMP on more detailed design principles and parameters. We also expect to see commitments on future engagement with the National Trust on detailed design outside of the DCO process. We will provide more detailed comments when we see the Applicant’s proposals to this end which we would hope to see by Deadline 3.</p>
SE.1.8	Applicant National Trust Historic England	<p>Socio-economic effects</p> <p>What consideration has there been in respect of the status of the site as a WHS, the economic value this brings to the area, and the degree of risks the works as currently proposed have to the future status of the site as a WHS?</p>	<p>WHS status is a matter for the UNESCO World Heritage Committee, and within the UK the Department for Digital, Culture, Media and Sport as the representative of the UK Government, as the State Party to the World Heritage Convention.</p> <p>However, we take the WHS status in the Stonehenge, Avebury &amp; Associated Sites WHS seriously - our assessment of the impact of the proposed road scheme on the WHS is based on expertise and evidence. We have assessed the impact of the proposed scheme on the Outstanding Universal Value (OUV) of the WHS using ICOMOS’ own guidance. We believe that the proposed scheme with the right approach to detailed design and delivery can protect the OUV of the WHS and as such should not endanger its WHS status. Our Written Representations explain the further detail that must be agreed to this end and also include our assessment work. Please also refer to the answer to SE.1.37 in respect of socio-economic considerations.</p>

<p>SE.1.37</p>	<p>Applicant                  National Trust                  Historic                  England</p>	<p>Socio-economic effects</p> <p>If the scheme is completed, it is argued that the WHS will become more attractive, reuniting the historic landscape currently divided by the A303.</p> <ul style="list-style-type: none"> <li>i. Have any plans been prepared to cater for this?</li> <li>ii. How would this be managed to continue to safeguard the future of the WHS?</li> </ul>	<p>As indicated in our Written Representation, the National Trust is Europe’s largest conservation charity and the largest private landowner in the UK. The Trust owns more than 800 ha of the Stonehenge part of the WHS, and we are committed to improving the physical (and intellectual) access to our land – to enhance the experience for visitors and to bring the wider landscape to life for people. The road scheme offers the potential for a large section of the landscape to be reunited, and we are confident that we can play our part to secure the benefits from this opportunity.</p> <p>The Trust intends to commission landscape architects to work with our archaeologists and other conservation specialists in order to envision how the landscape can appear – and function – following the construction of the proposed scheme. This will take full account of cultural heritage – to protect and enhance the OUV of the WHS – and the natural environment; including the continuation of our grassland reversion project. We also aim to connect with people who use the landscape, both local communities and visitors from further afield. We would continue to work in partnership, recognising that we are not the only landowners in the Stonehenge landscape.</p> <p>The Trust is already working in partnership with English Heritage Trust on a day-to-day basis and in terms of thinking operationally about the site should the Applicant’s proposed road scheme be progressed. We are committed to liaising with them and other partners regarding the wider vision. Both as an organisation and within our partnerships, we have experience of managing and balancing conservation with access, plus developing high quality visitor propositions in historic, beautiful and nature rich landscapes. Currently, we are in the early stages of practical planning and have allocated appropriate resources to develop ideas and – when appropriate – to deliver these.</p> <p>Much of this work will be undertaken through the WHS governance framework, through the WHS Partnership Panel and Steering Committees. The work of these groups is facilitated by the WHS Coordination Unit. The WHS Coordination Unit is currently procuring three strategies for the WHS for tourism, access and transport. This work will set the overall strategy for each of these areas for WHS partners. It is due to be completed by spring 2020.</p>
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**Additional questions we have chosen to provide a response to:**

Ag.1.7	Applicant	<p><b>Agricultural land (access)</b> 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.</p>	<p>Without mitigation in addition to the deep cutting, the western surface stretch of the A303 from the tunnel entrance to the WHS property boundary would have unacceptable adverse impacts on three important barrow cemeteries (Normanton Down, Winterbourne Stoke and the Diamond). In particular, the Winterbourne Stoke and Diamond barrow groups are close together and would be visibly divided by the road.</p> <p>In contrast to an alignment on the line of the existing A360, our assessments show that the position of Green Bridge Four in the proposed scheme reduces the impact on OUV from a moderate to a minor impact, reuniting the visual relationships between a substantial proportion of the Winterbourne Stoke and Diamond Barrow groups. The increased width and position of Green Bridge Four would therefore help to mitigate the adverse impact of the road as it passes between the two monument groups, and additionally ensure the bridge forms an effective link between these important monuments that convey attributes of the OUV of the WHS.</p> <p>The proposed 150m bridge, modelled in line with existing contours, could give an effective continuous landscape between a substantial component of the Winterbourne Stoke barrow group and of the Diamond group and as such offer an acceptable mitigation, if sensitively designed and sited.</p>
AL.1.17	Applicant	<p>The ES, Chapter 3 Assessment of alternatives, paragraph 3.3.1 explains that five options remained under consideration at statutory consultation held between February 2018 and April 2018. Table 3.4: Western portal approach options compares the two options presented for the approach to the western portal. i. Please explain why the grass</p>	<p>The proposed vertical sides will reduce the visual impact of the traffic and the road itself from outwith the cut. The sloped version would be more visible and increase the visibility of both the road and traffic from the key monument groups that convey attributes of OUV of the WHS. It would also require a fifty percent greater land take than the vertically sided solution with grassed top, and so would have a much greater physical impact on the WHS with the increased possibility of impacting on unknown archaeology.</p>

		<p>slopes option was considered to be less preferable in terms of OUV impact with particular regard to Winterbourne Stoke crossroads barrow group.</p> <p>ii. Please explain the assumptions made in relation to visibility of signage and buildings.</p>	
AL.1.20	Applicant	<p>In relation to the proposed removal of the previously proposed link between Byways AMES 11 and AMES 12 within the WHS:</p> <p>i. Please explain in further detail why this option was considered to be preferential.</p> <p>ii. What is the perceived impact of vehicle traffic within the WHS?</p> <p>iii. How is it anticipated that such traffic would increase disturbance of nesting stone curlew in the Normanton Down RSPB reserve?</p> <p>iv. Explain the consideration given to the needs of motorised users of the Byways in reaching this decision.</p>	<p>The consultation documents proposed to link byways 11 and 12 along a new route to the south of the existing A303 alignment. The byways are not currently linked other than by virtue of the A303. We do not consider that there is a need or a justification to provide a new link between byways 11 and 12.</p> <p>Furthermore, the assessment work that we have carried out with Historic England (which has been included as part of our Written Representation) shows that a link with BOAT status (either as proposed in the consultation document, on the line of the old A303 or anywhere else within the WHS) would have a detrimental and unacceptable adverse impact on the OUV of the WHS. Given the proposed scheme seeks to address the damage caused by motorised traffic in this part of the WHS, it is inappropriate to reintroduce that damage by creating a new route for motorised vehicles within the part of the WHS from which motorised vehicles would otherwise be a lesser intrusion.</p> <p>Use of the BOATs by motorised vehicles has led to damage to archaeological sites (including Scheduled Monuments) which abut, and in some cases are crossed by them, and can disturb the atmosphere and relative tranquillity of parts of the WHS. The presence of vehicles here also adversely impacts on visual relationships between monument groups, in particular between Stonehenge and the Normanton Down Barrow group. Since the publication of the first Stonehenge World Heritage Site Management Plan in 2000, it has been a policy to reduce or remove vehicular access from the two byways.</p> <p>Our position remains that we strongly oppose any proposed link between byways 11 and 12 for motorised vehicles.</p>

CH.1.19	Applicant	<p><b>Para 6.9.32: Historic buildings</b> Why is the significant effect (moderate adverse) on Stables and Barn at Countess Farm noted in Table 6.11 not described?</p>	<p>We also consider that the significant effects on Countess Farm need to be fully described as requested. Clarification on how the mitigation at Countess Farm will achieve the visual impact reduction from large adverse to moderate adverse by year 15 is sought. In <i>6.1 Environmental Statement Chapter 7: Landscape and Visual, Table 7.11: Summary of significant effects – construction</i> and <i>Table 7.12: Summary of significant effects - operation year 1</i>, Countess Farm a High Receptor Sensitivity has a Major Impact Magnitude and a Large adverse Residual Effect. In <i>Table 7.13 Summary of significant effects – operation year 15</i>, Countess Farm is predicted to have Moderate Impact Magnitude and a Moderate adverse Residual Effect. In <i>6.1 Chapter 16: Summary: Table 16.1 Summary of effects</i> the Permanent adverse effects on these listed buildings at the Construction Phase are then not described at the Operational Phase, which appears to the Trust to be contradictory.</p> <p>Additional information is required on this reduction in the Impact Magnitude and Residual Effect and how based on the best case scenario the proposed mitigation of planting will deliver this reduction over 15 years. Currently the proposed planting is restricted to within the soft estate of the existing highway, in addition an unspecified number of trees are to be removed to create sufficient area for the drainage system (see <i>Fig 2.2 Preliminary design drainage catchments, Countess Pond 1, Countess Catchment 12, Outfall Catchment 15, Countess Pond 3 and Catchment 15</i>), which will limit the space for replacement or additional planting. The visualisations shown in <i>ES Figures APP -145 and APP-146</i> illustrate the view from the North-East and therefore do not fully show the impact magnitude of the flyover on Countess Farm. We seek additional mitigation in the form of extended fencing and planting including standard trees to maximise the buffering, with 100% archaeological mitigation for all works undertaken within the WHS.</p>
CH.1.30	Applicant HMAG	<p><b>Paras 3.6.7-12: HMAG and the Scientific Committee</b> i. Have HMAG's recommendations been incorporated in the Scheme? ii. Do HMAG have misgivings over any aspects of the Scheme?</p>	<p>HMAG's Terms of Reference are submitted for information along with the Terms of Reference for the Scientific Committee. The membership of HMAG is drawn from Historic England, the National Trust, Wiltshire Council Archaeology Service and English Heritage Trust. As such HMAG would not be able to contribute to the examination as a group or prepare Statements of Common Ground, though members of HMAG would be able to contribute to the Examination as part of their individual organisations.</p>

		<p>iii. Would HMAG and WCAS be able to contribute to the examination as groups, perhaps at hearings or preparing statements of common ground with the Applicant?</p>	
CH.1.54	HMAG	<p><b>Mitigation measures</b> Please comment on the detailed mitigation measures proposed in the OAMS.</p>	<p>As a member of HMAG we are engaged with the Applicant in consultation on the draft DAMS (which supersedes the OAMS). We will therefore provide comments on the draft DAMS when we see the version of the DAMS that we understand will be submitted by the Applicant at Deadline 2. Within the DAMS we would expect to see the highest standards of mitigation appropriate to an archaeological WHS.</p>
Ec.1.7	Applicant	<p><b>Habitat creation</b> What long term management measures are incorporated in the DCO to ensure that the suggested enhancements and new habitat creation along the length of the scheme are managed to maximise gains in biodiversity and prevent scrub encroachment which could eventually degrade areas of new chalk grassland (para 8.8.18)?</p>	<p>We would also request clarification on the future management responsibilities of these areas.</p> <p>In order to deliver the planned gains in biodiversity, an ongoing programme of monitoring and grassland sward supplementation will be necessary to introduce target butterfly larval food plants and other chalk grassland species that fail to establish during the initial creation, or are under-represented in the sward. Where grazing has been identified as the management tool, detail is required on how essential infrastructure such as fencing, gates, stock handling systems and water will be provided. For all areas of scrub a cyclical management regime will need to be implemented to prevent encroachment causing deterioration in the diversity of the open areas of chalk grassland.</p>

DCO.1.68	Applicant	<p>The Additional Submission document 1, Appendix 5.1, for Works No 1A (vi) indicates that the construction and installation of a new variable message sign would be controlled by means of the reference to the same within Table 3.3b of the OEMP which in turn is secured by Requirement 4.</p> <p>i. However, would that provide a sufficiently precise and satisfactory safeguard in relation to the erection of such a sign at the western end of the WHS or should that be made the subject of a specific Requirement?</p> <p>ii. Please explain in practice what is meant by the reference to “<i>no road sign will be set higher than the top of the adjacent cutting</i>”.</p> <p>iii. The Additional Submission document 1 also indicates that, if changes were made to the position of the Motorway Signal Mark 4 (MS4s), it would still be the intention of the Applicant not to locate them within the WHS. However, are there satisfactory safeguards within the dDCO to prevent that occurrence or should that be made the subject of a specific Requirement?</p>	<p>The location of variable message signs 'along the length of the Scheme' (6.1 Environmental Statement, Chapter 2, 2.3.48) is contra to the advice provided by the National Trust to the Applicant (and assurances given by them) that in order to protect the OUV of the WHS no such signage should be located within the WHS.</p> <p>The Trust therefore seeks a Requirement that no variable message signs will be located within the WHS. In addition, we would expect to comment further on the Applicant’s response to this question given the importance of this issue.</p>
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