

**A303 Amesbury to Berwick Down
(Stonehenge) Wiltshire
TR010025**

**Wiltshire Council Comments on
Selected Relevant Representations**

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1. Glossary of Terms

AA	Appropriate Assessment (under the Habitats Regulations)
BOAT	Byway Open to All Traffic (as Restricted Byway but also includes mechanically propelled vehicles although mainly used FP, BW, RB)
CEMP	Construction Environmental Management Plan
DAMS	Detailed Archaeological Mitigation Strategy
DCO	Development Consent Order
ES	Environmental Statement
HE	Highways England
LHA	Local Highway Authority
MPV	Mechanically Propelled Vehicle
NPPF	National Planning Policy Framework
NO2	Nitrogen Dioxide
OEMP	Outline Environmental Management Plan
PROW	Public Rights of Way
RB	Restricted Byway (pedestrians, horse-riders, and non-mechanically propelled vehicle, includes horse-drawn vehicles and bicycles)
ROWIP	Rights of Way Improvement Plan
WHS	World Heritage Site

2. Wiltshire Council's Comments on Selected Relevant Representations

Relevant Representation	Wiltshire Council Response
RR-0306	Wiltshire Council would not regard another junction on the A303 to connect to the B3083 route as appropriate in the absence of information about the local impacts of the junction itself and implications of local traffic redistribution impacts.
RR-0858	Wiltshire Council notes that the issues of noise and dust will be addressed in the Scheme Outline Environmental Management Plan (OEMP) and the Construction Environmental Management Plan(s) (CEMPs).
RR-1030	<p>A thorough archaeological evaluation has been carried out and the Scheme has been designed to avoid or preserve in-situ the most significant archaeological remains. The assessments carried out to date indicate there will be no impact on the archaeological remains at Blick Mead. A DAMS has been developed that uses the results of the evaluation to target the most significant remains for preservation in-situ and other features for full excavation. The mitigation strategy includes methodologies for further assessment and investigation of archaeology in the topsoil.</p> <p>Wiltshire Council believes the current proposed design may lead to increased surface water runoff from some catchments e.g. from the Parsonage Down culvert, to receiving watercourses. Additional information is required to address how this increased runoff will be managed / mitigated.</p>
RR-1032	Wiltshire Council commissioned Atkins to review HE groundwater flood risk assessment. Overall the groundwater study approach is sound and appropriate methods have been adopted where possible. However, a number of inconsistencies and omissions have been identified which require further detail / modelling to be reported / undertaken.
RR-1040	<p>A thorough archaeological evaluation has been carried out and the Scheme has been designed to avoid or preserve in-situ the most significant archaeological remains. The assessments carried out to date indicate there will be no impact on the archaeological remains at Blick Mead. A DAMS is being developed that uses the results of the evaluation to target the most significant remains for preservation in-situ and other features for full excavation. The mitigation strategy includes methodologies for further assessment and investigation of archaeology in the topsoil.</p> <p>Wiltshire Council believes the current proposed design may lead to increased surface water runoff from some catchments e.g. from the Parsonage Down culvert, to receiving watercourses. Additional information is required to address how this increased runoff will be managed / mitigated.</p>
RR-1041	Wiltshire Council concurs with the views expressed in relation to the suggestions relating to provision and treatment of accesses to agricultural land.
RR-1043	Wiltshire Council strongly agrees with the concerns expressed (item 6) in relation to the removal of the layby to the West of Winterbourne Stoke.

Relevant Representation	Wiltshire Council Response
RR-1400	Wiltshire Council strongly agrees with the view of the Winterbourne Stoke Parish Council in relation to the removal of the layby to the west of Winterbourne Stoke, including for the reasons stated.
RR-1432	An extensive and comprehensive ecological survey and assessment of the effects of the Scheme on the footprint and the area of predicted impact in the surrounding landscape has been undertaken and the results used to design the finer detail of the Scheme so that the impacts on wildlife are removed, or reduced as far as possible and compensated for. The assessment has included the construction period and the post construction period and the changes to the natural environment in the local area as a result of the Scheme being implemented.
RR-1504	A thorough archaeological evaluation has been undertaken and the reports are now available. A DAMS is being prepared which outlines preservation in-situ for the significant archaeological features. Other features will be fully excavated prior to any groundworks started and a full programme of post-excavation reporting and publication has been agreed, including outreach and education activities.
RR-1532	<p>Wiltshire Council strongly disagrees with the views expressed in the relevant representation, in relation to the suggested retention of the existing A303 past the Stones for use by mechanically propelled vehicles (MPVs), either as a through road or as a car park and access. To retain the existing A303 could have serious consequences for the proposed Scheme in relation to the requirement to provide suitable junctions at either end of the suggested 'Scenic Route', which, in themselves, would be potentially damaging to local interests. Whilst the point is made that <i>People have travelled to and past this location for thousands of years</i>, it is the case that rights to travel past the Stones will be retained, but without access so close to the Stones by MPVs.</p> <p>There is a significant risk that the provision of parking areas either at Longbarrow or at Stonehenge Road would attract campers. If charges and strict parking controls were to be introduced as a disincentive to overnight parking, then the whole point of such provision would be questionable in the context of charged-for parking closer to the Stones.</p>
RR-1536	<p>It should be noted that HE's Relevant Representations response references paragraph 6.9.26. in the ES, stating that there will be a "permanent significant adverse effect on the setting", however the text in the ES states that "The impact is assessed as resulting in a moderate adverse effect." Wiltshire Council believes there would clearly be an impact on the setting of Countess Farm, however as per earlier council responses, the existing junction arrangement already has a significant impact on the historic setting of the farm and the proposed alterations would make this only slightly greater. The level of harm would certainly fall within the 'less than substantial' realm as defined by the NPPF, and there are substantial public benefits that outweigh that harm, as per NPPF 196. Furthermore, the Scheme's assessment indicates no negative impact on the archaeological remains at Blick Mead. Whilst, the Council accepts that the road may be more visible, it believes that any negative impact on dark skies can be mitigated through planning controls and conditions.</p> <p>The Council further notes that Highways England (HE) modelling predicts no exceedance of Nitrogen Dioxide (NO₂) limits and that due to the high levels of traffic noise existing currently, the Scheme was assessed as having little or no adverse impact in terms of increase in noise level.</p>

Relevant Representation	Wiltshire Council Response
RR-1537	<p>Wiltshire Council is concerned that the land take from Amesbury Property Company (and other parties) for the delivery of the Allington Track diversion route connecting with Equinox Drive should not be compromised below such a width as to provide for a minimum 5.5m carriageway, (with occasional passing places to accommodate wide loads associated with Boscombe Down), as well as flat verges of no lesser width than 2m on both sides, and suitable forward visibility provision to accommodate appropriate sight lines.</p> <p>It should be noted that the Definitive Statement for BOAT Amesbury 1 records the byway as having a legal width of between 2.5 and 3.65 metres, although it is silent on the matter of where along the length of the byway variations within these parameters lie. The proposal to provide a minimum width of 4.0 metres is, therefore, supported by the Council as Highway Authority.</p>
RR-1542	<p>The existing BOAT Amesbury 1 incorporates a public right of way for vehicles (motorised and non-motorised), equestrians (including carriage drivers), cyclists and walkers. Stopping-up of the Byway with the retention of a footpath is not a creation of a new right of way but a protection of some of the existing rights. Wiltshire Council's Rights of Way and Countryside Officers consider that, once it will no longer be possible for motorised (or any) users to gain access to and from the A303, the byway will no longer be needed or necessary for use by equestrians and cyclists. However, the public may still wish to be able to view the barrows from the byway, therefore a right of way on foot should continue to be provided in accordance with the Council's statutory duty as the local highway authority to assert and protect, as far as possible, the rights of the public to the use and enjoyment of the highways in its area.</p>
RR-1583	<p>The appropriate consenting body must be consulted and the necessary approvals obtained if any changes to the discharge arrangements for the pumping station at the grain handling facility are proposed.</p>
RR-1584	<p>This representation should be considered in the context of RR1586, which suggests returning the surface of the stopped-up highway to a 'natural' condition. The nature of the surface on the right of way will need to have regard to its proper and lawful future uses, including adequate surface structure for the movement of agricultural vehicles, machinery and equipment. Representations about returning the land to a grass finish should be considered in this context. As a length of stopped up highway, the Council, as LHA, would cease to have a direct interest.</p>
RR-1588	<p>Wiltshire Council takes the view that it is undesirable for the very large farm vehicles, such as combined harvesters, to have to travel via Amesbury town centre, and would seek to have a solution whereby access could be gained from Countess Road North.</p>
RR-1606	<p>Wiltshire Council has a statutory duty under the Highways Act 1980 to assert and protect, as far as possible, the rights of the public to the use and enjoyment of the highways in its area. Wiltshire Council's Rights of Way Officers are concerned that motorised users in particular of Byway WSTO6b will not agree that downgrading the byway will improve the rights of way network. The officers also question whether downgrading this byway will significantly contribute to the peacefulness of the greater WHS landscape when it is taken into account that the DCO application includes the proposal to carry the A303 over the byway by means of a viaduct. Access from vehicular highways to either end of Byway WSTO6b is not directly affected by the changes to the A303, other than that the Scheme, if the DCO application is approved, will be implemented over and around it. Downgrading of this byway does not appear to be necessitated by the Scheme.</p>

Relevant Representation	Wiltshire Council Response
	Wiltshire Council notes that the issues of noise and dust will be addressed in the scheme OEMP and the CEMP.
RR-1621	<p>Wiltshire Council notes that the Scheme has undergone an AA under the Habitats Regulations (which implement the Habitats Directive in UK legislation). All potential impacts on statutory designated sites within the calculated zone of influence have been identified and mitigation designed to remove or reduce impact to an insignificant level. Natural England are in agreement with the conclusions of the AA.</p> <p>Furthermore, the Scheme has been assessed as having no direct impact on the Nile Clumps.</p>
RR-1681	Wiltshire Council believes the Scheme has been carefully designed to avoid direct impact on highly significant archaeological remains. Following on from a thorough programme of archaeological evaluation, a Detailed Archaeological Mitigation Strategy (DAMS) is being developed which will target significant archaeological remains for preservation in-situ, with full excavation for other remains. The direct impact on archaeological remains has been minimised. The mitigation programme includes a strategy for full publication, education and outreach. It has been assessed that there will be no impact on archaeological remains at Blick Mead.
RR-1725	<p>In response to points 2.1.1 and 2.1.2, Wiltshire Council has been and continues to be in discussion with HE and Heritage partners concerning the design details of the public rights of way. The Council notes that the Examining Authority requires HE to provide design details for the public rights of way by Deadline 2. In response to 2.3.5, the Rights of Way and Countryside Act 2000 requires the council to publish a Rights of Way Improvement Plan (ROWIP) which takes into account the present and likely future needs of the public.</p> <p>Provision through Highways England's proposals as contained in the application for the Development Consent Order (DCO) to provide alternative and new routes for non-motorised users accord with the aims of the Council's ROWIP (Countryside Access Improvement Plan 2015-2025) and in particular to improve connectivity of byways. The provision of a link byway between Longbarrow and the Stonehenge Visitor Centre will contribute to the ultimate aspiration to create a largely motorised-traffic free multi-user route for walkers, cyclists, horse-riders and carriage-drivers between the Wylve and Till Valleys to Salisbury Plain.</p>
RR-1740	Wiltshire Council notes that the identification of breeding and foraging sites for Bustards has been included in the ecological surveys to inform the Scheme.
RR-1741	Wiltshire Council does not accept that there will be loss of rights of way for carriage drivers. The proposals create new sections of Restricted Byways which will give more extensive and improved access for non-motorised users, with additional links to the wider byway network.
RR-1742	The proposal to create a byway open to all traffic (BOAT) over the existing bridleway BSJA3 is supported by Wiltshire Council as a means of regularising the existing use that is made of it by the public with vehicles, in substitution for the section of the existing BOAT which follows a cross-field route which has not been available for use for many years, without evidence of complaint. The Council believes that the opportunity to recognise and meet the present and likely future needs of the public by making this change should be taken.

Relevant Representation	Wiltshire Council Response
RR-1844	<p>The proposal to create a BOAT over the existing bridleway BSJA3 is supported by Wiltshire Council as a means of regularising the existing use that is made of it by the public with vehicles, in substitution for the section of the existing BOAT which follows a cross-field route which has not been available for use for many years, without evidence of complaint. The Council believes that the opportunity to recognise and meet the present and likely future needs of the public by making this change should be taken.</p>
RR-1898	<p>Wiltshire Council notes that the Scheme has undergone an Appropriate Assessment (AA) under the Habitats Regulations (which implement the Habitats Directive in UK legislation). All potential impacts on statutory designated sites within the calculated zone of influence have been identified and mitigation designed to remove or reduce impact to an insignificant level. Natural England are in agreement with the conclusions of the AA.</p> <p>A thorough archaeological evaluation programme has been carried out across the Scheme area and the results are being used to develop a DAMS. Wiltshire Council accepts the Scheme has been designed carefully to avoid direct impact on the most significant archaeological remains. Within the mitigation strategy many features have been identified for preservation in-situ and others for full excavation. The strategy includes a programme of archaeological and heritage outreach and education activities.</p>
RR-1977	<p>Wiltshire Council, as the local Highway Authority for the public rights of way, will continue to work with HE, landowners and occupiers, the police and rights of way user groups to minimise, through lawful solutions, unnecessary disturbance in terms of fly-tipping, illegal camping and property damage. The Council has been and continues to be in discussion with HE and Heritage partners concerning the design details of the public rights of way, and notes that the Examining Authority requires HE to provide design details for the public rights of way by Deadline 2.</p> <p>Wiltshire Council believes it is essential that the location of the green bridges remain as proposed in order to remove impacts for European Protected Species (bats). Moving the bridge further east or west will not provide adequate function for bats, which will continue to cross in the same places, with severe detrimental consequences for the local bat population, as they will be at high risk of being hit by traffic.</p> <p>The OEMP and CEMP include safeguards to the quality of the Private Water Supplies and the Council has asked for additional information on this issue.</p>
RR-1980	<p>Wiltshire Council, as the local Highway Authority for the public rights of way, will continue to work with HE, landowners and occupiers, the police and rights of way user groups to minimise, through lawful solutions, unnecessary disturbance to the Reserve in terms of fly-tipping, illegal camping and property damage. The Council has been and continues to be in discussion with HE and heritage partners concerning the design details of the public rights of way, and notes that the Examining Authority requires HE to provide design details for the public rights of way by Deadline 2.</p>

Relevant Representation	Wiltshire Council Response
	<p>The Council notes that the OEMP and CEMP include safeguards to the quality of the Private Water Supplies. Wiltshire Council has asked for additional information on this issue.</p>
RR-2060	<p>Wiltshire Council commissioned Atkins to review HE's groundwater flood risk assessment. Overall the groundwater study approach is sound and appropriate methods have been adopted where possible. However, a number of inconsistencies and omissions have been identified which require further detail / modelling to be reported / undertaken.</p> <p>The OEMP and the CEMP include safeguards to the quality of the Private Water Supplies and the Council has asked for additional information on this issue.</p>
RR-2108	<p>The OEMP and CEMP include safeguards to the quality of the Private Water Supplies and the Council has asked for additional information on this issue.</p> <p>Wiltshire Council has a statutory duty under the Highways Act 1980 to assert and protect, as far as possible, the rights of the public to the use and enjoyment of the highways in its area. Wiltshire Council's Rights of Way Officers are concerned that motorised users in particular of Byway WSTO6b will not agree that downgrading the byway will improve the rights of way network. The officers also question whether downgrading this byway will significantly contribute to the peacefulness of the greater World Heritage Site (WHS) landscape when it is taken into account that the DCO application includes the proposal to carry the A303 over the byway by means of a viaduct. Access from vehicular highways to either end of Byway WSTO6b is not directly affected by the changes to the A303, other than that the Scheme, if the DCO application is approved, will be implemented over and around it. Downgrading of this byway does not appear to be necessitated by the Scheme.</p>
RR-2201	<p>The Groundwater Risk Assessment (Appendix 11.4 of the Environmental Statement) states that groundwater monitoring will be undertaken during a baseline period, construction, and a minimum 5-year period post construction (as required by Wiltshire Council). This information will be invaluable to confirm that the design is functioning as intended and any required mitigation works.</p> <p>The Council notes that the location of the green bridges has been partly determined by ecological survey and the necessity to provide crossing points in specific places, to reduce potential impacts on European Protected Species such as bats.</p> <p>The Council also notes that it is for HE to carry out any negotiations. It is likely that Wiltshire Council will only be involved in any such negotiations where it is the land owner / local highway authority / party benefitting from rights granted or reserved over the area of land in question.</p>

Relevant Representation	Wiltshire Council Response
RR-2209	<p>The Scheme has undergone an AA under the Habitats Regulations (which implement the Habitats Directive in UK legislation). All potential impacts on statutory designated sites within the calculated zone of influence have been identified and mitigation designed to remove or reduce impact to an insignificant level. Natural England are in agreement with the conclusions of the AA.</p> <p>Wiltshire Council believes the current proposed design may lead to increased surface water runoff from some catchments e.g. from the Parsonage Down culvert, to receiving watercourses. Additional information is required to address how this increased runoff will be managed / mitigated.</p>
RR-2252	<p>The OEMP and the CEMP include safeguards to the quality of the Private Water Supplies, and control of dust arising from the construction phase. Wiltshire Council has asked for additional information on this issue. If the tunnel arisings are not spread on the land then Wiltshire Council has asked that additional air quality modelling is undertaken to assess the impact of transporting waste off-site on other local Air Quality Management Areas.</p>
RR-2293	<p>The Scheme has undergone an AA under the Habitats Regulations (which implement the Habitats Directive in UK legislation). All potential impacts on statutory designated sites within the calculated zone of influence have been identified and mitigation designed to remove or reduce impact to an insignificant level. Natural England are in agreement with the conclusions of the AA.</p>
RR-2303	<p>The OEMP and the CEMP include safeguards to the quality of the Private Water Supplies and the Council has asked for additional information on this issue.</p> <p>Wiltshire Council, as the local Highway Authority for the public rights of way, will continue to work with HE, landowners and occupiers, the police and rights of way user groups to minimise, through lawful solutions, unnecessary disturbance to the Reserve, in terms of fly-tipping, illegal camping and property damage.</p>
RR-2306	<p>An extensive and comprehensive ecological survey and assessment of the effects of the Scheme on the footprint and the area of predicted impact in the surrounding landscape has been undertaken and the results used to design the finer detail of the Scheme so that the impacts on wildlife are removed, or reduced as far as possible and compensated for. The assessment has included the construction period and the post construction period and the changes to the natural environment in the local area as a result of the Scheme being implemented.</p>
RR-2329	<p>Wiltshire Council concurs that agreement on a treatment for the decommissioned A303 is required. As a shared route for the public as a Byway and a private access route for agricultural vehicles the surface treatment needs to be able to accommodate both requirements whilst being as visually unobtrusive within the landscape as can be achieved. Wiltshire Council will continue to work with HE, the Heritage organisations, landowners and occupiers on appropriate, durable, low maintenance solutions.</p>
RR-2345	<p>The OEMP and the CEMP include safeguards to the quality of the Private Water Supplies and the Council has asked for additional information on this issue.</p>

Relevant Representation	Wiltshire Council Response
	<p>Wiltshire Council has a statutory duty under the Highways Act 1980 to assert and protect, as far as possible, the rights of the public to the use and enjoyment of the highways in its area. Wiltshire Council's Rights of Way Officers are concerned that motorised users in particular of Byway WSTO6b will not agree that downgrading the byway will improve the rights of way network. The officers also question whether downgrading this byway will significantly contribute to the peacefulness of the greater WHS landscape when it is taken into account that the DCO application includes the proposal to carry the A303 over the byway by means of a viaduct. Access from vehicular highways to either end of Byway WSTO6b is not directly affected by the changes to the A303, other than that the Scheme, if the DCO application is approved, will be implemented over and around it. Downgrading of this byway does not appear to be necessitated by the Scheme.</p>
RR-2354	<p>The OEMP and the CEMP include safeguards to the quality of the Private Water Supplies and the Council has asked for additional information on this issue.</p> <p>Wiltshire Council has a statutory duty under the Highways Act 1980 to assert and protect, as far as possible, the rights of the public to the use and enjoyment of the highways in its area. Wiltshire Council's Rights of Way Officers are concerned that motorised users in particular of Byway WSTO6b will not agree that downgrading the byway will improve the rights of way network. The officers also question whether downgrading this byway will significantly contribute to the peacefulness of the greater WHS landscape when it is taken into account that the DCO application includes the proposal to carry the A303 over the byway by means of a viaduct. Access from vehicular highways to either end of Byway WSTO6b is not directly affected by the changes to the A303, other than that the Scheme, if the DCO application is approved, will be implemented over and around it. Downgrading of this byway does not appear to be necessitated by the Scheme.</p>
RR-2355	<p>Wiltshire Council notes that the HE assessment indicates that there will be no impact on the archaeological remains at Blick Mead. However, the Council believes the current proposed design may lead to increased surface water runoff from some catchments e.g. from the Parsonage Down culvert, to receiving watercourses. Additional information is required to address how this increased runoff will be managed / mitigated.</p> <p>The Scheme has undergone an AA under the Habitats Regulations (which implement the Habitats Directive in UK legislation). All potential impacts on statutory designated sites within the calculated zone of influence have been identified and mitigation designed to remove or reduce impact to an insignificant level. Natural England are in agreement with the conclusions of the AA.</p>
RR-2363	<p>Wiltshire Council commissioned Atkins to review HE's groundwater flood risk assessment. Overall the groundwater study approach is sound and appropriate methods have been adopted where possible. However, a number of inconsistencies and omissions have been identified which require further detail / modelling to be reported / undertaken.</p>

Appendix A - List of Relevant Representations Reference Numbers and Names

Relevant Representation	Relevant Representation Name
RR-0306	Rupert Penny
RR-0858	Carter Jonas LLP on behalf of Travelodge Hotels Limited
RR-1030	Prof. M. Parker Pearson
RR-1032	Wessex Chalk Stream and Rivers Trust
RR-1040	Prof. M. Parker Pearson on behalf of Consortium of 22 Stonehenge experts
RR-1041	E. Grant & Sons
RR-1043	Francis William George Whiting
RR-1400	Winterbourne Stoke Parish Council
RR-1432	David Waters
RR-1504	Rescue, The British Archaeological Trust
RR-1532	Walter Stephen Macnally
RR-1536	Merrett and Co on behalf of Amesbury Abbey Group
RR-1537	PFA Consulting on behalf of Amesbury Property Company Limited & ClassMaxi Limited
RR-1542	Countryside Solutions on behalf of Beacon Hill Land Limited
RR-1583	Countryside Solutions on behalf of Morrison and King Limited
RR-1584	HOWARD SMITH MRICS on behalf of P J ROWLAND & SONS (FARMERS) LIMITED
RR-1588	Howard Smith Mrics on behalf of Mrs P M Sandell
RR-1606	Fowler Fortescue on behalf of Robert Turner
RR-1621	The Campaign to Protect Rural England - Wiltshire
RR-1681	Council for British Archaeology
RR-1725	Freeths LLP on behalf of English Heritage
RR-1740	Great Bustard Group
RR-1741	Green Lane Association (Wiltshire area)
RR-1742	Green Lanes Environmental Action Movement (GLEAM)
RR-1844	Peak District Green Lanes Alliance
RR-1898	The Stonehenge Alliance
RR-1977	Berwick Down Ltd
RR-1980	Biddesden House Farm Partnership
RR-2060	Environment Agency
RR-2108	Fowler Fortescue on behalf of J&M Turner and Son
RR-2201	Carter Jonas LLP on behalf of M&R Hosier
RR-2209	Mark Bush
RR-2252	National Farmers Union
RR-2293	Rebecca Rhind-Tutt
RR-2303	Rupert Hosier
RR-2306	Ruth Manvell
RR-2329	Stonehenge and Avebury WHS
RR-2345	Fowler Fortescue on behalf of The Turner Family
RR-2354	Fowler Fortescue on behalf of TURNER (WINTERBOURNE STOKE) LIMITED
RR-2355	University of Buckingham
RR-2363	Wessex Chalk Stream and Rivers Trust 1