

**From:** [Archie](#)  
**To:** [A303 Stonehenge](#)  
**Subject:** Ref. Group A 20019736 - Morrison & King Limited  
**Date:** 03 May 2019 19:49:38  
**Attachments:** [MKL - Appendix One.pdf](#)  
[MKL - Appendix Three.pdf](#)  
[MKL - Appendix Four.pdf](#)  
[MKL - Appendix Five.pdf](#)

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Dear Sir/Madam

I refer to The Examining Authority's first Written Questions and requests for information (ExQ1) Issued on 11 April 2019. I represent Morrison & King Limited, a Tier One Landowner. In accordance with your examination timetable, I am submitting responses to the relevant questions as follows:

Ag.1.23

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Attached is an ownership plan contained as Appendix One in our Written Representations. Further details are contained with our Written Representations. The only land severed is some horse grazing associated with the livery business. Further details are contained within our Written Representations and in response to Question CA.1.49.

Ag.1.24

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Morrison & King Limited do not rely upon a private borehole.

CA1.49

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The relevant extracts from our Written Representation are copied below and Appendices attached.

## **1. Proposed Site Compound**

1.1. The level of detail provided by the Applicant relating to the proposed site compound on MKL's freehold has been woefully inadequate. Virtually the full extent of this is contained within the illustrative layout attached within Appendix Three. The self-same document raises more questions than it answers:

1.1.1. If there are to be extensive offices as shown where is the parking provision or are all workers expected to arrive by public transport?

1.1.2. This illustrative layout has been prepared to the same scale as the main compound within the same Appendix and this merely serves to underscore the vast scale of the stockpiles shown within the proposed site compound, estimated to cover in excess of nine acres. No explanation as to what these stockpiles will consist of has been forthcoming despite repeated enquiries of the Applicant. It seems almost inconceivable that an engineering project is proposing nine acres to be compulsory acquired for stockpiling and yet the detail of what is to be stockpiled is not available.

1.1.3. The hours of operation also remain a mystery as despite having been referenced to the working hours undertakings provided within the Outline

Environmental Management Plan without knowing which aspects of the Scheme the compound/stockpiles are associated with it is not possible to ascertain the likely hours of operation. See 4.2.2 below.

- 1.1.4. The illustrative layout referred to above shows a new water main being installed across the site; a site that is known to have archaeological interest. When questioned over this water main the Applicant explained that this was to be a water supply to the tunnel/main compound and it was therefore suggested that a better route might be found; one that did not require a crossing of the River Avon nor an area of known archaeological interest. It was subsequently revealed that this supply was for the proposed site compound on MKL's freehold and not the tunnel/main compound whatsoever, contrary to the detail within the illustrative layout. Surely as simpler and less disruptive supply could be taken from the main within Countess Road for that purpose?
- 1.2. Whilst it is understood that the NFU will be submitting further representations on soils it is considered necessary to make reference to this matter in respect of the proposed site compound.
- 1.3. In common with all farming businesses, MKL's existing soils are an immensely valuable resource. The appropriate, diligent and timely management of this resource is key to its business endeavours. Significant concerns exist generally regarding the areas to be occupied during the construction phase of the Scheme and specifically in respect of the temporary compound to be located within its freehold. MKL seeks binding assurances in respect of the following:
  - 1.3.1. Pre-commencement soil survey; to include topsoil type, site variance and subsoil structure.
  - 1.3.2. Adherence to an agreed and detailed Soil Management Plan devised in accordance with best industry practice; to include methods of working, extent of topsoil removal, site specific topsoil storage methods, weed control, reinstatement methods, aftercare and post-scheme monitoring.
  - 1.3.3. No soil to be exported from nor imported to the temporary storage compound site.
  - 1.3.4. Protection measures for subsoil structure; to include the laying of a geotextile membrane with stone above across all trafficked areas.
- 1.4. It has hopefully been made clear that the current level of detail regarding the proposed site compound is woefully inadequate to enable reasoned judgements and representations to be made. The most worrying of all being that when repeated enquires have been made of the Applicant regarding further necessary detailed information the stock reply has been that such information '*will be determined by the appointed contractor*' and '*produced prior to works commencing*'.
- 1.5. There appears to be no impediment to any future contractors' tender process by the inclusion of agreed specifications for these important details. It is therefore respectfully suggested that the Examining Authority seek clarification from the Applicant regarding this lack of detail and consider the cost implications of the same.

## 2. Impact Upon Horse Livery Enterprise

- 2.1. MKL has diversified its agricultural business by operating a horse livery enterprise out of a stable yard identified on the plan attached as Appendix Four. The stable yard consists of stables for a maximum of eight horses and an associated manège. The livery business utilises the grassland identified on the same plan. MKL supplies home produced hay and straw to this enterprise.
- 2.2. MKL has significant concerns regarding the likely disturbance to this enterprise arising from the Scheme. These concerns are fourfold as detailed below and insufficient detail has been provided by the Applicant to allay such concerns.

### 2.2.1. Disturbance

The location of the site compound immediately adjacent to the stable yard will undoubtedly lead to significantly increased levels of noise, dust and light intrusion. The Applicant has referenced the relevant topic chapters of the Environmental Statement, including Chapter 5, Air Quality (APP-043), Chapter 7 (APP-045), Landscape and Visual, Chapter 9 APP-047), Noise and Vibration, and Chapter 13 (APP-051), People and Communities (document reference 6.1). These assessments have concluded that there would be a range of adverse impacts during construction, presumably the entire period that the site compound is located adjacent to the stable yard.

The most noteworthy omission in respect of these assessments is that they have been conducted from a human perspective and it is a widely accepted fact that horses are considerably more sensitive to noise, dust and artificial light than humans.

### 2.2.2. Hours of Operation

Attached as Appendix Five is an extract from the Applicant's submission 6.3 Environmental Statement Appendices Appendix 2.2 Outline Environmental Management Plan detailing working hours.

To date MKL has not been given any definitive explanation as to what the proposed site compound will be used for. It is reasonable to assume that the proposed compound will require earthworks and therefore could be subject to *Summer working hours of 07:00 – 22:00 Monday to Saturday with occasional working on Sundays and Bank Holidays.*

The Applicant has confirmed that some of the proposed compound area *'will be for use as topsoil or chalk stockpile only which will act as a shield for other construction site activity. Indicative plans show construction yard zoning are included in the Environmental Statement (6.2 Environmental Statement Figure 2.7 A-E - Illustrative construction layout including compounds and haul routes)'*

The mention of chalk stockpiles and haul routes has given rise to further concerns that the proposed site compound may be utilised for tunnelling spoil and this would further extend the working hours as detailed within Appendix Five *'Tunnelling and directly associated activities (such as removal of excavated material.....) may need to be carried out on a 24 hours 7 days/week basis'*

Whether the working hours are 0700 to 2200 (with an additional hour either side

permissible) 6 days/week or 24 hours 7 days/week is probably academic because neither is in any way compatible with an equine leisure use immediately adjacent.

#### 2.2.3. Grazing/Outriding

Area Ref.09-22 identified in Appendix Two is currently permanent pasture and utilised by the livery enterprise for grazing. The Scheme proposals for this area to be planted with trees will see this grazing lost permanently to the livery business and prior to planting access will be prevented as the area will be severed by the proposed site compound.

#### 2.2.4. Security

Security at livery yards is extremely important, as they are frequently the target for low level rural crime. Potential clients looking for livery are highly sensitive to any perceived 'security threats' where they may be considering stabling their horse. It is hard to imagine that a large and active adjoining site compound would not have an adverse impact upon the perception of yard security whether any actual crime were to arise or not.

2.3. The keeping and riding of horses is a rural leisure activity into which MKL has diversified. The positioning of a substantial active site compound immediately adjacent to the centre of such an enterprise can only have a detrimental effect.

Yours faithfully

**Archie Read MRICS**

Office: +44 (0)1722 442494

Mobile: [REDACTED]

**Countryside Solutions 9 Scots Lane Salisbury SP1 3TR United Kingdom**

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