

WRITTEN REPRESENTATION MADE BY F W G WHITING TO SPEAK AT HIGHWAYS ENGLAND OPEN FLOOR HEARINGS – A303 AMESBURY TO BERWICK DOWN ROAD SCHEME

1. **Introduction.** The following response details points that Mr F W G Whiting wishes to make in response to Highways England’s (HE) notification of open floor hearings due to take place between the 22 and 24 May 2019. Mr Whiting would like to raise 3 issues as detailed below.
2. **Issue 1. HE land acquisition at Scotland Lodge Farm (SLF).**
 - a. **Issue Explanation.** HE intend to either compulsorily or temporarily acquired 15 acres of SLF to enable the A303 Amesbury to Berwick Down road scheme to be built. Of the 15 acres:
 - i. Approximately 1 acre (land parcel 03-23) will be compulsory purchased for the re-routing of the B3083 (Winterbourne Stoke to Shrewton road).
 - ii. Approximately 14 acres (land parcels 03-13 and 03-14) will be temporary acquired for the purposes of disposal of spoil and re-landscaping.

The respondent takes no issue with the compulsory acquisition of land for the purposes of the re-routing of the B3083. The respondent has issue with the temporary acquisition of land for the purposes of disposal of spoil and re-landscaping. In addition, upon completion of the road build, the respondent would like to understand why HE need to retain rights over this ground rather than return it completely to the landowner at the completion of the road scheme.

- b. Temporary Acquisition of Land for the Purposes of the Disposal of Spoil and Re-Landscaping.** The two land parcels (03-13 and 03-14, detailed in *Figure 1*) are proposed to be temporarily acquired from SLF throughout the duration of the road build. The respondent takes no issue with the temporary acquisition of land parcel 03-13. It is unclear the reasons for the acquisition of land parcel 03-14 which is not being used for the disposal of spoil or for re-landscaping. In discussions with HE the reason articulated is described as “for the purposes of enabling works for the alteration and strengthening of the Esso pipeline”. The Esso pipeline only crosses land parcel 03-14 in the western most corner and well clear of any re-landscaping works. If enabling works are required in order to alter the integrity of the current Esso pipeline, it is unclear why these works cannot take place on ground where the pipeline requires strengthening rather on ground where the pipeline will remain unaltered (land parcel 03-14). It is requested that land parcel 03-14 be removed from within the “red line” of the road scheme and that it is not temporarily acquired by HE.



Figure 1 – SLF fields to be permanently and temporarily acquired by HE

- c. **The removal of rights currently planned to be retained by HE following the handing back of temporarily acquired land at the completion of the project.** Upon the completion of the road scheme, land parcels 03-13 and 03-14 will be handed back to the respondent with certain rights over this ground retained by HE. It is unclear the purpose of these retained rights, what they constitute and why they are required to be left in place? Once the road scheme has been completed there appears no logical explanation why any rights should be retained over land handed back to the respondent and therefore these should be removed from the scheme.

3. Issue 2. The Construction of Green Bridge 1, the retention of the existing layby and creation of restricted access from the layby across Green Bridge 1.

- a. **Introduction.** The design and siting of Green Bridge 1, the retention of the layby and the creation of a new right of way across Green Bridge 1 has been justified by HE on two counts:
 - i. A route for the transit of wildlife (the requirement to maintain existing bat flight lines).
 - ii. The need to maintain access to existing agricultural land north of the new A303.

The coupling of these two issues, although laudable, has resulted in a suboptimal and potentially expensive road design solution. Were both issues to be dealt with

separately it is believed that a more cost effective and acceptable solution could be found.

- b. The Construction of Green Bridge 1.** The construction of Green Bridge 1 is proposed, principally to ensure that bat flight lines are maintained across the newly constructed A303. The proposed site of the green bridge is located approximately 200 meters west of the actual flight lines with other landscaping measures being put in place to “encourage” bats to adjust their flight lines and utilise the bridge. The construction of some form of green bridge is not contested. Its current location has however been selected to reduce the cost of construction; locating it where the new A303 enters a cutting rather than where the actual flight line exits. If the considerable expense of building a green bridge is to stand up to scrutiny where is the evidence that:
- i. The bats will be persuaded to alter their flight lines to cross the green bridge.
 - ii. That following 5 years of construction and the dumping of spoil on the bat feeding areas that there are going to be any bats left to justify the considerable expense of a green bridge. With this in mind, it may be more cost effective to consider cheaper solutions such as wires that have been utilised on other road schemes.

The key observation from the above is that a more cost-effective solution to the green bridge would allow better targeted investment elsewhere in the road scheme.

- c. The Retention of the existing layby.** HE plans see the retention of the layby to the west of Winterbourne Stoke. Justification for its retention has not been stated although believed to be as a carparking area to enable access across Green Bridge 1 to the newly created area of chalk grassland. With the declassification of the current A303, the layby will no longer be required. It is a man-made structure, not in keeping with the surrounding landscape and therefore should be re-landscaped and returned to agricultural use. The area is sizeable and would be an excellent and more cost-effective location into which to dump spoil from the tunnel; in so doing, saving other areas from being blighted. As a freely accessible site, close to Stonehenge, set within a much-improved road network and isolated out of direct observation, the layby’s retention is likely to result in considerable and enduring cost to both the public and private purses.

- i. **The Public Cost.** Likely to include:
 - The long-term cost of maintaining access.
 - The likely cost (weekly) of clearance of both rubbish and illegally dumped waste.
 - The likely policing cost of responding to unlawful and antisocial activity.

- The likely policing and legal costs of moving unlawful encampments.
- ii. **The Private Cost.** The cost to private landowners will include the increased risk of unlawful and antisocial activity including, vandalism, theft, illegal encampments, trespass, loss of privacy, inappropriate and illicit activity, damage to crops and livestock, dumping of waste, and litter. Such activity already takes place in the vicinity of the current layby and is only likely to increase with the layby remaining easily accessible but more isolated thereby encouraging such anti-social activity.

It is recommended that the site of the exiting layby be used as a location into which to dump tunnel spoil and then returned the site to agricultural use in order that it can be managed effectively and not become a drain on both public and private resources.

- d. **Creation of restricted access from lay by to existing agricultural land to the north of the new A303.** According to HE, the access proposed across Green Bridge 1 is for the sole purpose for landowners to obtain access to agricultural land to the north of the new A303. Decoupling the location of the Green Bridge 1 from the provision of access to agricultural land means that there are potentially a number of other viable and more cost-effective options:
- i. **Option 1. Access provided along the northside of the new A303.** Access could be established along the northern side of the new A303 that would begin just to the north of the new underpass (where the A303 goes across the Shrewton road). Although this would require the extension of the proposed track on the northern side of the new A303 (approx. 650 m). It would negate the creation of the proposed access from the layby to the green bridge (approx. 520 m) and provide excellent access off the existing road network. Critically, it would allow the green bridge to either be re-located to the exact flight line or for a more cost-effective bat flight line options to be considered allowing re-investment of savings elsewhere in the road scheme. A diagrammatic representation of this proposal is detailed in *Figure 2*.

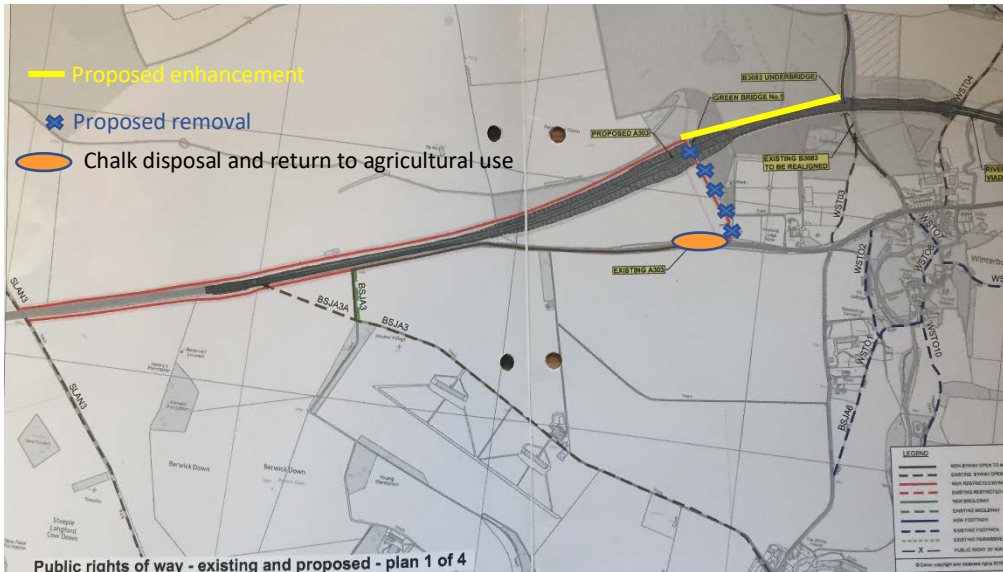


Figure 2 – Access along northern side of A303

ii. Option 2. Access provided via a crossing point:

- Where bye way (SLAN3) crosses the A303.** This option would see an under or overpass created where the current byway (SLAN£) crosses the A303. Because of the expense of creating an underpass for the byway, the current plan sees the byway diverted down the southern side of the A303, across Green Bridge 1 and back up the northern side of the new A3030. This is believed to be a suboptimal solution with the risk that any person either walking, cycling or using recreational transport is likely to look at the detour of 6.2 km and with human nature as it is, opt for the most direct route that would create an unofficial crossing point and add significant danger to both those attempting a cross and road users on the A303. This potential danger would be removed by building a crossing (bridge or tunnel) for the byway (SLAN3) (resourced by the adoption of a more cost-effective scheme at the site of Green Bridge 1). This new crossing point would also allow access to the agricultural land to the north of the A303 via the 650m extension of the track detailed above (option 1) and would negate the building of circa 4.3 km of other access up and down the northern and southern side of the A303. A diagrammatic representation of this proposal is detailed in Figure 3.

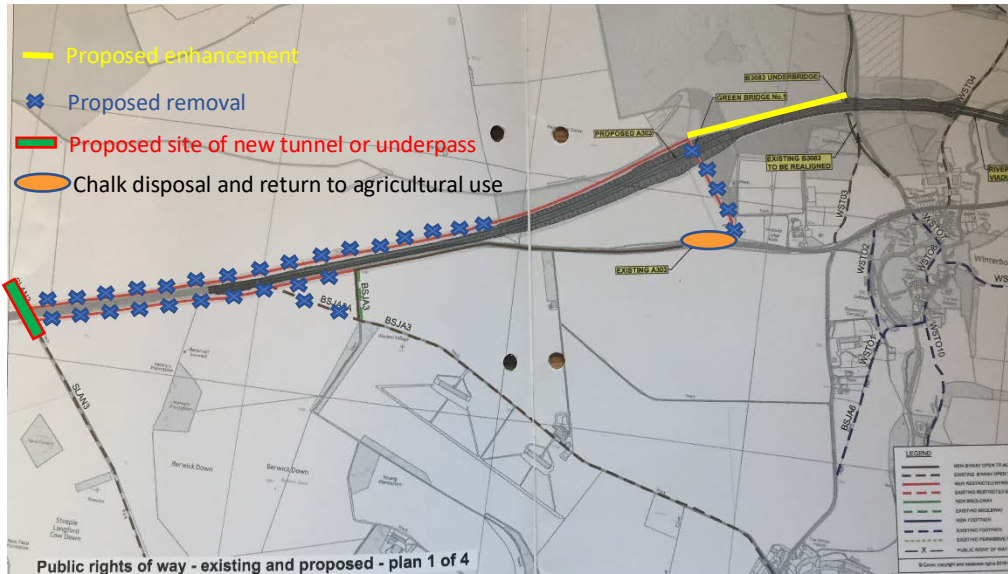


Figure 3 – Byway crosses A303

- **The point where existing access from the chicken farm crosses the A303.** An alternative option would be to move the access point (tunnel or bridge), again resourced by the reconsideration of Green Bridge 1, to the point where access from the chicken farm crosses the existing A303. Although this option would not completely remove the risk of uses of byway (SLAN3) to take a short cut across the A303. Although not removing completely the detour that SLAN3 byway users would have to use, it would dramatically reduce it and would negate the building of track access (circa 2 km). A diagrammatic representation of this proposal in detailed in Figure 4

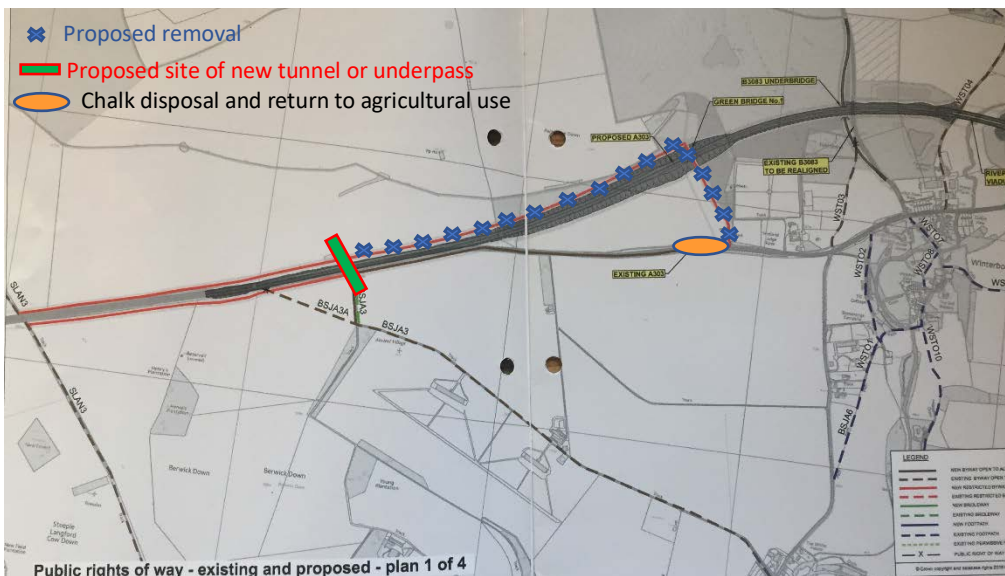


Figure 4 – The point where existing access from the chicken farm crosses the A303

It is recommended that the design and location of Green Bridge 1 be reviewed and an alternative solution (1, 2 or 3 listed above) that removes the requirement for restricted access across Green Bridge 1 is adopted.

4. **Issue 3. The adoption of restrictive access along the decommissioned A303, west of SLF.** The HE plan sees the creation of a new byway running the length of the decommissioned A303 from the western end of the existing layby to where the decommissioned road meets the new A303. It is not disputed that access will be required along the decommissioned A303 in order to conduct essential maintenance works to the in-place infrastructure as well as allow access to the Berwick St James chicken farm. This does not however require the creation of a new byway that is open to all traffic. Access to the Berwick St James chicken farm and for maintenance of essential infrastructure can be achieved via restricted access. The proposed creation of this new byway is challenged as:

- a. It has no logical destination and therefore is not required.
- b. Will create a circuit for vehicular use around the villages of Winterbourne Stoke and Berwick St James, potentially becoming both a public and private nuisance and danger to other network users.
- c. As with the layby (discussed above), opening additional freely accessible byways so close to Stonehenge and a much improved road network is only going to encourage activity characteristic of that currently occurring closer to Stonehenge that both the National Trust and English Heritage have been trying to prevent with the closure of byways and re-routing of roads around Stonehenge. To use this road scheme to open new byways on the fringes of the world heritage site; in effect pushing the negative implications of a demand to view Stonehenge for free, onto neighbouring landowners is not believed to be in the remit or spirit of the road build. Opening un restricted byways is likely to result in considerable and enduring cost to both the public and private purses as already identified at paragraph 3c.

It is recommended that the plan for the decommissioned A303 is changed to become a restricted access track, restricted to access for essential infrastructure maintenance and access for agricultural purposes only. These restrictions should be put in place from the entrance of SLF, westwards along the existing A303.

