

A303 Amesbury to Berwick Down

TR010025

Deadline 3
8.20.1 - Comments on Local Impact Report – Wiltshire Council

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The Infrastructure Planning (Examination Procedure) Rules 2010

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COMMENTS ON LOCAL IMPACT REPORT – WILTSHIRE COUNCIL

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1 Introduction

1.1 Purpose of this report

- 1.1.1 Wiltshire Council submitted a Local Impact Report (LIR) in accordance with the requirements set out in the Planning Act (the 2008 Act) and the Advice Note One: Local Impact Reports (republished April 2012, (version 2)).
- 1.1.2 The Advice Note states that the “content of the LIR is a matter for the local authority concerned as long as it falls within the statutory definition”. The LIR should consist of a statement of positive, neutral and negative local impacts.
- 1.1.3 The Advice Note states that when the Examining Authority decides to accept an application it will ask the relevant local authorities to prepare a LIR and the relevant local authorities should prioritise preparation of their LIR irrespective of whether the local authority considers the development would have a positive or negative impact on the area. The LIR may include any topics that it considers to be relevant to the impact of the development on its area and will serve as a means by which its existing body of knowledge and evidence on local issues can be fully and robustly reported to the Examining Authority.
- 1.1.4 This report sets out Highways England’s response to the positive, negative and neutral local impacts identified in the LIR, in order to ensure that local issues and impacts are identified, understood and carefully addressed and to aid the Examining Authority in its consideration of the proposal.

1.2 Structure of the Report

- 1.2.1 This report responds to the positive, negative and neutral local impacts identified by the local authority Wiltshire Council. Sections 2 to 11 of this report correspond to Sections 4 to 13 of the Wiltshire Council LIR submission.
- Section 2: Local Growth and Development – Strategic Economic Objectives
 - Section 3: Relevant planned development
 - Section 4: Archaeology and World Heritage Site considerations
 - Section 5: Local Transport
 - Section 6: Public Rights of Way (PROW)
 - Section 7: Ecology and Landscape
 - Section 8: Built Heritage
 - Section 9: Public Health and Public Protection
 - Section 10: Flood Risk and Drainage

- Section 11: Social and Community Issues

1.2.2 In addition to the provision of responses to positive, negative and neutral local impacts, this report responds also, where applicable, to comments contained within appendices A, B and C of the Wiltshire Council LIR. Reflective of the structure of the Wiltshire Council LIR, relevant responses are contained within appendices A, B and C of this report, as follows:

- Appendix A: Conformity with individual policies of the Development Plan
- Appendix B: Consolidated list of suggested requirements with reasons
- Appendix C: Consolidated list of suggested development consent obligations

1.2.3 It is noted that Appendix A of the Wiltshire Council LIR provides commentary on the Development Plan policies which Wiltshire Council considers to be relevant. A response is provided in Appendix A of this report to those issues where Wiltshire Council considers that the Scheme is not compliant or only partially compliant with those policies.

2 Local Growth and Development – Strategic Economic Objectives

Table 2-1: Local Growth and Development: Positive Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
2.01	Increased investor confidence that major infrastructure delivery is real and improved supply chain will be delivered.	Noted.
2.02	Local employment opportunities in construction and support of the project.	Noted.
2.03	Incoming construction workers using local services and lodgings.	Noted.

Table 2-2: Local Growth and Development: Positive Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
2.04	The Scheme will remove a potential barrier to investment, improve connectivity between businesses and their customers, and provide employees with greater access to higher value jobs.	Noted.
2.05	A significant part of the proposal falls within the Amesbury Community Area. There is already a significant cluster of excellence centred on scientific defence, research and development operating in this community area and using this as leverage to attract synergistic inward investment is a key objective of the WCS. The area strategy for the Amesbury community area lists specific issues that need to be addressed in planning for this area. It recognises that the A303 corridor runs through the area and is a main arterial route from London to the south west. It suffers from problems, with	Noted.

	intermittent stretches of single lane carriageway causing large delays at peak times.	
2.06	Effective, efficient road links are fundamental to enable businesses to prosper and help to unlock further economic growth. The Scheme between Amesbury and Berwick Down will significantly reduce journey times which in turn will cut transport costs, and give businesses in Wiltshire better access to the market, suppliers and skills. Wiltshire's inward investment attractiveness will also be strengthened and the creation of a high-performing dual carriageway will improve accessibility between businesses and their customers. The Scheme will help to link people with jobs and provide better access to their customers. The Scheme will also help to provide better access to higher value, local jobs which in turn will contribute towards reducing out-commuting from Wiltshire. Therefore, the proposal will have a major positive impact on delivering the WCS vision for Amesbury.	Noted.
2.07	At a regional level, the South West region is home to one of the largest concentrations of aerospace and defence activities in Europe and the largest cluster in the UK, with its local supply chain supporting 14 of the world's leading aerospace / defence companies. The centre of excellence developing at Boscombe Down and Porton Down is a significant part of this. The Scheme will consolidate this position by improving connections between regional business communities, enabling more efficient access to their supply chains as well as providing employees better access to high skilled jobs.	Noted.
2.08	Increases in GVA throughout the region due to increased output and turnover of Businesses. Total impact on GVA (over 60 years, discounted, 2025 opening): £39.77 billion.	Noted. Devon County Council have provided an update of this assessment in section 4 of their written representation [REP2-086]

2.09	Employment-related impacts, including the generation of new employment opportunities and the financial benefits accruing to Government. Total number of new jobs generated across the South West region: 20,600. ¹²	Noted.
2.10	Tourism-related impacts, including increases in visitor expenditure in the region as well as increases in employment supported by these increases in expenditure. Total impact on visitor expenditure in the region (2022 opening): £8.6 billion. ¹²	Noted.
2.11	Impacts associated with land development and increases in land values due to the provision of improved transport infrastructure. ¹²	Noted.
2.1.2	Other benefits, including those associated with the impacts of increased disposable income. Total disposable income spent in region (2022 opening): £3.4 billion. ¹²	Noted.
2.13	Combined impact on employment-related taxation (2022 opening): £2.3 billion; Combined impact on employment-related reduction in welfare payments (Jobseekers' Allowance, 2022 opening): £1.3 billion. Impacts related to items such as taxation and visitor expenditure are those that can be captured and distributed across various beneficiaries. ¹²	Noted.

Table 2-3: Local Growth and Development: Neutral Impacts

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None identified	

Table 2-4: Local Growth and Development: Negative Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
2.14	Restriction of supply chain (delivery of components and products to and from local businesses) due to route disruption during construction phases.	The A303 will remain in operation throughout construction and flows on local roads are not anticipated to change to any significant degree, as explained in chapter 9 of the Transport Assessment [APP-297]. Temporary traffic management measures will be needed at times and there will be close liaison with Wiltshire Council to determine the measures that can be best implemented to minimise any disruption, as part of a wider Traffic Management Plan which will be required to be developed pursuant to paragraph 9 of Schedule 2 to the DCO, and the Outline Environmental Management Plan [APP-187]; compliance with which is secured by paragraph 4 of Schedule 2 to the DCO.
2.15	Potential fewer tourists to Stonehenge due to disruption on roads and construction disturbance.	The Case for the Scheme [APP-294] considers the tourism benefits of the Scheme. Temporary traffic management will ensure minimum additional disruption during construction and consequently it is not anticipated that tourism will be affected in this period. Such effects will be managed through a

		Traffic Management Plan, developed pursuant to paragraph 9 of Schedule 2 of the draft DCO [APP-020], which will include the details set out in item MW-TRA2 of the Outline Environmental Management Plan [APP-187], compliance with which is secured through paragraph 4 of Schedule 2 of the draft DCO.
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Table 2-5: Local Growth and Development: Negative Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None identified	

3 Relevant Planned Development

Table 3-1: Relevant Planned Development: Positive Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
3.01	Synergistic labour forces and supply chains when constructing new development at Boscombe and Porton especially the new road from the A303 to the airbase.	Noted.
3.02	Opportunity to borrow and donate spoil for land profiling.	Noted.

Table 3-2: Relevant Planned Development: Positive Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
3.03	Establishing and supporting the supply chain to an established centre of excellence at Porton, Boscombe and Salisbury Plain.	Noted.
3.04	Improving access to the UK's principal military grouping.	Noted.
3.05	Facilitating serious consideration of a boost in housing delivery to match new jobs.	Noted.

Table 3-3: Relevant Planned Development: Neutral Impacts

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None identified	

Table 3-4: Relevant Planned Development: Negative Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
3.06	Restriction of supply chain (delivery of components and products to and from local businesses due to route disruption during construction phases).	The A303 will remain in operation throughout construction and flows on local roads are not anticipated to change to any significant degree, as explained in chapter 9 of the Transport Assessment [APP-297]. Temporary traffic management measures will be needed at times and there will be close liaison with Wiltshire Council to determine the measures that can be best implemented to minimise any disruption, as part of a wider Traffic Management Plan which will be required to be developed pursuant to paragraph 9 of Schedule 2 to the DCO, and the Outline Environmental Management Plan [APP-187]; compliance with which is secured by paragraph 4 of Schedule 2 to the DCO.

Table 3-5: Relevant Planned Development: Negative Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None identified	

4 Archaeology and World Heritage Site (WHS) Considerations

Table 4-1: Archaeology and WHS Considerations: Procedural Issues

Ref	Wiltshire Council LIR Comment	Highways England Response
4.01	<p>WCAS understand that the DCO is presented as an indicative design scheme (7.2 Design and Access Statement 1.2.1) and that further design details will follow post consent. However, the lack of design details at this stage makes it difficult to fully assess the impact of the Scheme on cultural heritage, landscape setting and the need for mitigation.</p>	<p>The application for development consent submitted by Highways England was accepted by the Planning Inspectorate, on behalf of the Secretary of State for Transport, who, after the 28-day formal acceptance period, concluded that it met the standards required to progress to examination. As part of the consideration to formally accept the application for examination the Secretary of State needed to have been satisfied that the application documents contained adequate information on the Scheme.</p> <p>Highways England considers there is sufficient information provided in the application to allow the Scheme's likely significant effects to be understood and to inform the need for mitigation. The design has been fixed to an appropriate level for the DCO application. The design is sufficiently developed to have undertaken a comprehensive Environmental Impact Assessment (EIA), as reported in the Environmental Statement (ES) [APP- 039 – APP-054], and, in the context of the World Heritage Site, a Heritage Impact Assessment (HIA) [APP-195].</p> <p>The parameters of the permission sought are constrained to the horizontal limits established by the Works Plans [APP-008], the vertical limits of the Engineering Section Drawings (Plan and Profiles) [APP-010], the Engineering Sections Drawings (Cross Sections) [APP-011] and the Tunnel Limits of Deviation Plan [APP-019], subject to the limits of deviation established by article 7 of the draft DCO [REP2-003]. The design of the Scheme elements will be developed through the detailed design stage of the project. The detail in the application documents of the various design elements is set out below:</p> <ul style="list-style-type: none"> • Photomontages and CGI visualisations have been presented within the LVIA Chapter (Chapter 7 [APP-045] and Cultural Heritage Chapters (Appendix 6.9 [APP-218] of the ES for the Till Valley, green bridges and

		<p>the tunnel portal. Design and visual representations will be developed through the detailed design process. The further detailed design of the Scheme will be sensitive to its WHS context, following Highways England's guide 'The Road to Good Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf). In so far as it impacts on the WHS, the design of the key elements of the Scheme will be developed in consultation with Wiltshire Council.</p> <ul style="list-style-type: none"> • In the context of signage, the Scheme has committed to no signage or other vertical installations (such as CCTV) above the top of the cutting and no lighting of signs at the western end of the Scheme in order to protect the WHS's OUV (see OEMP, D-CH8). To minimise the visibility of new infrastructure within the WHS signage and other highways installations will sit completely within the approach cuttings and not extend above them. Appropriate signage and infrastructure would be provided outside the WHS to manage traffic through the corridor. • The proposed Scheme will have no lighting within the WHS beyond that necessary within the tunnel and beneath the c. 150 metre wide Green Bridge No. 4 near Longbarrow junction. There will be no lighting within the open cutting, and tunnel lighting will be designed to minimise light spill outside of the tunnel portals. Lighting under Green Bridge No. 4 will only operate during daylight hours. There will be no roadside lighting at the new Longbarrow Junction, and the improved Countess junction will utilise new directional roadside lighting to minimise light spill. This lighting is provided for in the Outline Environmental Management Plan (OEMP) (D-CH9 to D-CH12), and paragraph 4 of Schedule 2 of the DCO [REP2-003] requires the scheme to be carried out in accordance with the OEMP. These are significant improvements over the current situation, where both Countess and Longbarrow junctions are brightly lit.
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		<ul style="list-style-type: none"> • Fencing in the WHS shall be developed in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council (the Heritage Monitoring and Advisory Group (HMAG)), as secured in the Outline Environmental Management Plan (OEMP) (D-CH14). During construction, the main works contractor shall consult with the relevant bodies to determine the type of construction boundary fencing to be used within the WHS or within the setting of the WHS (OEMP MW-CH3). The OEMP is secured under paragraph 4 of Schedule 2 within the draft DCO [REP2-003]. • For the new restricted byway within the World Heritage Site, the OEMP, reference D-CH14, requires Highways England to develop the fencing and surfacing within the World Heritage Site in consultation with the National Trust, Historic England, English Heritage and Wiltshire Council. 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]. The new restricted byway would provide a durable surface for non-motorised users including those needing mobility aids, and those vehicles permitted to use the route such as agricultural and maintenance vehicles. The surplus areas of redundant road surface would be replaced by chalk grassland and existing roadside furniture and infrastructure (signage, lighting columns etc.) would be removed (this approach is described in section 2.3.56 (d) of the Environmental Statement (ES)[APP-040]). Other new NMU routes within the WHS (A360 north to the Stonehenge Visitor Centre; A360 South to Druids Lodge) would be of similar form and design and would be constructed at or just above existing ground level and would utilise a no-dig construction solution. There would be no new street furniture adjacent to the new NMU routes and public rights of way. <p>Other key design elements that are secured via the OEMP include:</p>
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		<ul style="list-style-type: none"> • D-CH2 and D-CH3 which require the redundant sections of the road surface to the existing A303 and A360 (including the existing Longbarrow Roundabout) to be broken out, save to the extent they are required for public rights of way; • D-CH4 – requires Green Bridge Four to be approximately 150m wide; • D-CH5 – which requires the western approach to the tunnel to be in cutting to a minimum 7m depth with vertical retaining walls; • D-CH6 and D-CH7 – which require cut and cover tunnels extending eastwards and westwards from the bored tunnel; • D-CH9, D-CH10, D-CH11 and D-CH12 - which taken together limit the use of highway lighting within the WHS and require improved lighting at Countess Roundabout. <p>An updated version of the OEMP has been submitted for Deadline 3 that includes further design commitments, design principles and a robust mechanism for consulting heritage stakeholders (including Wiltshire Council) on aspects of the detailed design of the Scheme within the World Heritage Site. The implementation of the OEMP is secured by Requirement 4 of schedule 2 of the draft DCO.</p>
<p>4.02</p>	<p>The current version of the Environmental Statement (ES) is not as complete and robust as it could be as the archaeological field evaluation was only completed after the ES was submitted and the various reports have been finalised subsequently. It is our</p>	<p>The ES is complete and robust. A full and comprehensive programme of archaeological evaluation surveys was undertaken to inform the ES, including geophysical survey across all green field areas within the order limits and a high percentage of trial trenching and plough zone artefact sampling. The results of those evaluations, together with previous archaeological work detailed in the ES, informed the conclusions in the ES and the HIA. The results of confirmatory survey and sampling work done after submission confirm the archaeological baseline, the approach to mitigation and assessment of effects presented in the ES and they confirm its findings. Further detail follows.</p>

	<p>understanding that these will be submitted into Examination for Deadline 1. Consequently, some of this chapter and the associated figures and plans may need amending to reflect this new information. This situation is not adequately reflected in the relevant paragraph on assumptions and limitations.</p>	<p>Whilst the results of the archaeological evaluation programmes were <i>reported</i> in the reports submitted on 12 April, it is incorrect to state that the archaeological field evaluation was only completed after the ES was submitted. Fieldwork was undertaken between January and August 2018 and the results of that work were reported in paragraphs 6.6.13- 6.6.52 (fieldwork) and paragraphs 6.6.53 to 6.6.111, Appendix 6.2 [APP-211] and Figures 6.8 [APP-074] (baseline) of the Environmental Statement. The conclusions of the Environmental Statement were informed by those results, the non-intrusive archaeological geophysical survey of the entire Scheme boundary (referred to at ES paragraph 6.4.1(f) and Appendix 6.10 [APP-219]) and the results of historic surveys and fieldwork (referred to in ES paragraph 6.6.15 and summarised and listed at ES Appendix 6.10), allowing a robust assessment of baseline (as referenced above), approach to mitigation (ES section 6.8) and likely significant effects (ES section 6.9).</p> <p>Confirmatory surveys and sampling consisting of trial trenching on the Winterbourne Stoke Bypass, test pitting on one part of the Western Portal approach and geophysical surveys at Countess East and Amesbury Road were completed in October 2018. All fieldwork was monitored on site by HMAG and Wiltshire County Archaeology Service. The Scientific Committee were also invited to view the work at the tunnel portals and approaches. The results of this confirmatory survey and sampling work were reviewed against the archaeological baseline, approach to mitigation and assessment of effects presented in the ES and they confirm its findings. No changes to the conclusions as to the likely significant effects of the scheme were identified or were required.</p> <p>No changes to the conclusions in the Environmental Statement were identified or were required. As a result, no change to the assessments in the Environmental Statement and associated figures and plans are required.</p>
<p>4.03</p>	<p>The Outline Archaeological Mitigation Strategy-appendix 6.11 (OAMS) (which WCAS did not have sight of before it was submitted with the DCO) states it is a draft, which will be consulted</p>	<p>A Detailed Archaeological Mitigation Strategy (DAMS) will be developed prior to the end of the examination, from the Outline Archaeological Mitigation Strategy (OAMS) [APP-220] which was submitted with the DCO application, in consultation with Wiltshire Council Archaeology Service. Initial discussions on the DAMS have commenced with Wiltshire Council and will be ongoing throughout the Examination process in order to finalise the document. The DAMS is secured by paragraph 5 of Schedule 2 of the draft Development</p>

	<p>on by the heritage stakeholders, from which a detailed strategy (DAMS) will be developed for agreement and approval during the Examination. WCAS see it as essential that this is agreed prior to consent being granted.</p>	<p>Consent Order (DCO) [APP-020]. The DAMS will be informed by the completed evaluation survey reports referred to. The DAMS will contain cross-references to the OEMP [APP-187] (which contains the OAMS as an annex), where relevant.</p>
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Table 4-2: Archaeology and WHS Considerations: Positive Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None identified	

Table 4-3: Archaeology and WHS Considerations: Positive Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
4.04	Removal of the existing A303 through the central part of the World Heritage Site (WHS) landscape, will benefit the setting of Stonehenge and many groups of monuments which contribute to its OUV.	Noted. One of the fundamental objectives of the Scheme, as stated in the Case for the Scheme [APP-294], is to help conserve and enhance the World Heritage Site, by removing the sights and sounds of traffic through much of the WHS landscape, and make it easier to reach and explore, by reconnecting the northern and southern parts of the Stonehenge section of the WHS. The Scheme is assessed in the Heritage Impact Assessment [APP-195] to have a Slight Beneficial effect on the OUV of the WHS as a whole.
4.05	Removal of the existing severance caused by the A303 at the centre of the WHS between the proposed portal locations will improve the setting of key groups of monuments and improve access and visual connectivity between them.	Noted. The benefits of the Scheme associated with removal of the sight and sound of traffic from a large part of the WHS, the opportunity for reconnection of The Avenue, and the provision of a c.150 metre green bridge, are considered in the context of the whole WHS and the many scheduled monuments within it. The Heritage Impact Assessment, as set out in ES Appendix 6.1 [APP-044], Section 12.4, concludes that the scheme will deliver significant beneficial effects for the setting of many scheduled monuments within the WHS, as well as Stonehenge, whilst sustaining the OUV of the WHS.
4.06	Removal of the A303 as it crosses the Avenue to the west of the proposed Eastern Portal will help to reconnect the two parts of this linear monument currently severed. The removal of the Longbarrow Roundabout and stopping up of the A360 at this point will be beneficial to the setting of the	Noted. The Scheme will facilitate the reconnection of The Avenue where it is currently severed by the existing A303. The location and design of the new Longbarrow junction have been selected to give an optimum balance between achieving an efficient connection with the A360 and

Ref	Wiltshire Council LIR Comment	Highways England Response
	Winterbourne Stoke Barrow Cemetery Group and its visual relation with other barrow groups in the western part of the WHS.	reducing impacts on Winterbourne Stoke, the WHS and the surrounding landscape. The relocation of the junction outside the WHS and stopping up the A360 would be beneficial to the setting of the Winterbourne Stoke Barrow Cemetery Group and its visual relation with other barrow groups in the western part of the WHS.
4.07	A303 / A360 Longbarrow Junction – The departure from design standards to not provide permanent surface lighting within the WHS or at the proposed Longbarrow junction will minimise light pollution impacts.	Noted. The majority of the Scheme would not be lit. There would be no lighting within the WHS beyond that necessary within the tunnel and beneath the c.150 metre-wide Green Bridge Four (operating during day time only). There would be no lighting within the open cutting, and tunnel lighting would be designed to minimise light spill outside of the tunnel portals. There would be no roadside lighting at the new Longbarrow junction. This is a significant improvement over the current situation, where Longbarrow junction is brightly lit. This lighting is provided for in the Outline Environmental Management Plan (OEMP) [a revised version of which is submitted at Deadline 3] (OEMP Refs: D-CH9 to D-CH12), and Requirement 4 of Schedule 2 to the draft DCO [REP2-003] requires the Scheme to be carried out in accordance with the OEMP.
4.08	South of A303 / Solstice Park – The proposed new route between Allington Track and Equinox Drive includes a divergence of the AMES 1 byway to avoid the group of Scheduled Barrows (Ratfyn Barrows). This will remove traffic from the immediate vicinity of these Barrows.	Highways England acknowledges Wiltshire Council's positive comment.

Ref	Wiltshire Council LIR Comment	Highways England Response
4.09	Removal of the A303 through the WHS, inherent in the Scheme, will bring benefits for the centre of the WHS.	As noted above, the Scheme would remove the sight and sound of traffic through much of the WHS landscape, and make it easier to reach and explore by reconnecting the northern and southern parts of the WHS. The Scheme is assessed in the Heritage Impact Assessment [APP-195] to have a Slight Beneficial effect on the OUV of the WHS as a whole.

Table 4-4: Archaeology and WHS Considerations: Neutral Impacts

Ref	Wiltshire Council LIR comment	Highways England Response
4.10	River Till Viaduct – The inclusion of a screen to the bridge parapet is noted. This provides neither a positive nor negative impact in terms of archaeological considerations.	Highways England acknowledges Wiltshire Council's comment. The viaduct design has been chosen to carry the new road across the Till valley whilst retaining the open character of the valley floor, and to minimise its visual impact in the landscape in which it is proposed to be located. As set out in ES Chapter 7, Landscape and Visual [APP-045], section 7.8, the Scheme includes sympathetic regrading of the earthworks, new planting around the viaduct abutments, and new native hedgerow, to aid integration of the viaduct into the landscape and reduce visual intrusion. These measures are secured as part of the landscaping Scheme to be implemented pursuant to paragraph 8 of Schedule 2 to the draft Development Consent Order [REP2-003].
4.11	Western Portal - The fully grassed over canopy with external buildings will minimise visual impact on	Highways England acknowledges Wiltshire Council's comment. Design and visual representations will be developed through

	attributes of OUV and help minimise light pollution. With the careful design of the Portal, any potential impacts on the setting of the WHS will be neutral.	the detailed design process. The further detailed design of the portal and its associated infrastructure will be sensitive to its WHS context, following Highways England's guide 'The Road to Good Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf).
4.12	Eastern Section: Countess Junction to Just Beyond Solstice Park Junction Eastern Portal - The Eastern tunnel portal is proposed to be located to the east of King Barrow Ridge and the Avenue. The archaeological evaluation has revealed little of high archaeological significance and with mitigation there will be a neutral impact. With the careful location and design of the Portal any potential impacts on the setting of the WHS and assets of heritage significance will be neutral.	Highways England acknowledges Wiltshire Council's comment. Design and visual representations will be developed through the detailed design process. The further detailed design of the portal and its associated infrastructure will be sensitive to its WHS context, following Highways England's guide 'The Road to Good Design' (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf).
4.13	Modification of Rollestone Crossroads - Archaeological evaluation (geophysical survey and trial trenching) has been undertaken in respect to the modified proposal and no significant archaeological remains have been identified in this location.	Highways England acknowledges Wiltshire Council's comment.
4.14	Countess Flyover - Internationally significant Mesolithic remains and deposits with paleoenvironmental potential have recently been discovered in and around the Blick Mead area relating to the River Avon (south west of Countess roundabout and west of Amesbury Abbey). With careful design and mitigation to protect these deposits the flyover infrastructure impact will be neutral.	The Scheme alignment is optimised past Blick Mead, to avoid land-take and to keep the road at existing grade. [APP-044, para. 6.8.5]. Ground water modelling indicates no impact on Blick Mead (Abbey Pond) or the River Avon (see Blick Mead Tiered Assessment presented, ES Appendix 11.4 - Groundwater Risk Assessment, Annex 3 [APP-282]). The ES

		therefore reports No change and a Neutral Effect on the Blick Mead archaeological site (Appendix 6.8 - Cultural Heritage - Summary of non-significant effects [APP-217, page 5]).
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Table 4-5: Archaeology and WHS Considerations: Negative Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
4.15	The proposed Compound and Spoil Storage Area at Countess East contains significant archaeological remains including a Roman building and Saxon settlement. It may be difficult to use some or all of this area as proposed.	<p>The design and layout of compounds will be finalised at the detailed design stage. Measures for the protection of archaeological remains within compound areas are set out in ES Chapter 6 Appendix 6.11 in Section 4.2 and Table 2.2 (Site / Action Area Nos. 17, 20, 31) and the Draft Detailed Archaeological Mitigation Strategy (DAMS) [REP2-038, Appendix D, Action Areas: Preservation in situ, Site 31].</p> <p>With regard to preservation in situ in site compounds and working areas, the Draft DAMS states:</p> <p><i>“In these locations below-ground disturbance will be minimised with topsoil retained in situ and protected with imported stone to allow preservation in situ. Provision is made in the Strategy for certain archaeological monuments to be excluded for fill areas fenced off and protected in situ. Installation of utility connections will require targeted archaeological monitoring and recording and/ or archaeological excavation and recording (AER) where topsoil is required to be stripped.</i></p> <p><i>In accordance with item MW-CH5 of the OEMP [APP-187], the MW contractor will prepare a Method Statement as described in 4.1 above, setting out how it intends to preserve in situ sensitive archaeological remains and prevent deformation of topsoil/ subsoil horizons (including</i></p>

		<p><i>no-dig solutions), and how the measures would be reversed following the end of construction (i.e., removal of compounds).” [REP2-038, paras. 4.2.14-15].</i></p> <p>At the Countess East compound, the Draft DAMS notes, “Within the compound area there are various heritage assets representing multi-period activity and occupation that will require protection at an early stage (before the start of any preparatory works in the compound area). The remains comprise evidence of Neolithic activity, and Roman settlement (stone building and associated features) and Saxon settlement (series of sunken featured-buildings). Earlier test pitting (Wessex Archaeology, 1995) had produced c.60 sherds of Early/ Middle Anglo-Saxon pottery from the same area as the sunken featured buildings.</p> <p>This area is required for a construction compound and working area. The construction compound is to be formed above the existing ground level using imported stone.</p> <p>At each of the seven sites identified within the compound area the topsoil will be retained and will be protected by fencing. The protective fencing will incorporate a 10m buffer beyond the extent of the remains as mapped by the evaluation investigations. At the end of construction the fencing and fill material will be removed and the site returned to agricultural use.” [REP2-038, Site 31: Countess East compound area multi-period occupation (Neolithic, Iron Age, Roman and Saxon), pp. 176-178].</p>
4.16	A number of potential adverse impacts on heritage assets are outlined in the ES and the HIA and include the removal of a minimum of	The preferred route was carefully chosen to minimise effects on archaeology, and a comprehensive programme of archaeological evaluation surveys has informed the Scheme being designed in a way

	<p>around a dozen buried archaeological features in the line of the new carriageways and portals. Although some mitigation measures can be built in to minimise impacts, the potential adverse impacts cannot be removed completely.</p>	<p>that has limited any direct physical impacts on archaeology as far as practicable, including limiting impacts on archaeological remains that contribute to the OUV of the WHS.</p> <p>The research potential of the WHS is recognised in the HIA, which notes that it is not considered that the proposed Scheme will alter the nature, pace or quality of the research that will continue to take place within the WHS. The proposed Scheme will not impact upon the analysis, interpretation and dissemination of the results of field research. Although archaeological evaluations and excavations within the footprint of the proposed Scheme will remove archaeological deposits, the Scheme has been designed to minimise land-take and avoid known archaeological sites. Archaeological interventions in connection with the proposed Scheme are being undertaken to high standards developed with HMAG and the Scientific Committee, and have the potential to contribute significant data to ongoing research priorities [APP-195, 9.3.75].</p> <p>Archaeological remains would be excavated and recorded during the preliminary works phase, in advance of construction, to avoid, as far as is practicable, previously unknown archaeological remains being uncovered during construction. The Detailed Archaeological Mitigation Strategy (DAMS) [REP2-038] identifies areas to be protected in-situ. The application recognises the archaeological potential of the Scheme and therefore has put forward the Deadline 2 Submission - 8.11 Draft Detailed Archaeological Mitigation Strategy (DAMS) [REP2-038] which sets out the structured, iterative detailed archaeological mitigation strategy. It will be finalised prior to the end of the Examination and is secured by Requirement 5 of Schedule 2 of the draft Development Consent Order [REP2-003]. The DAMS is rooted in a heritage research-led framework [REP2-038; Section 2].</p>
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		Highways England acknowledges that following mitigation, the Scheme would have some residual adverse effects. The Environmental Statement reports both the significant and the non-significant Cultural Heritage effects within ES Chapter 6, Cultural Heritage [APP-044].
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Table 4-6: Archaeology and WHS Considerations: Negative Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
4.17	The imposition of restrictive covenants on land above the tunnel (referred to in the draft DCO, 4.3 the Book of Reference and the Land Plans, 2.2) may restrict the ability to undertake archaeological investigations in a core part of the WHS. HMAG are in discussions with HE to devise a detailed agreement to resolve this to ensure that research can continue to be undertaken unencumbered.	<p>As noted in the Statement of Reasons [APP-023], restrictions are required above the tunnel in order to secure protection of the tunnel from potentially conflicting future development and works that might jeopardise the structural integrity of the tunnel.</p> <p>The proposed Scheme would provide powers to impose restrictions which may affect future archaeological research above the tunnel route, in order to protect the structural integrity of the tunnel. There are no restrictions intended to be placed on future archaeological research elsewhere. It is expected that the restrictions will vary along the length of the tunnel, depending upon the depth of the tunnel below the surface. The detail of the restriction is under discussion, but as currently drafted would restrict excavations relating to future archaeological research below 0.6m in areas where the tunnel is shallow, and below 1.2m in areas where the tunnel is deeper. The restriction would not prevent excavations from being undertaken below this depth but would require a promoter of future archaeological research to consult with Highways England in such cases in order to</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>determine the extent to which that activity might have the potential to affect the structural integrity of the tunnel.</p> <p>In response to concerns raised by National Trust and HMAG that such restrictive covenants could impose an unacceptable restriction on future archaeological research, Highways England has identified that the level of restriction can be varied along the tunnel route based on the relative depth of the tunnel from ground surface. Where the tunnel is shallow (i.e. at the tunnel portals and at Stonehenge Bottom), any covenants imposed would need to involve a greater level of restriction, with a lighter restriction possible over the remainder of the route.</p> <p>The terms of the restriction are still under discussion with the landowners and heritage partners. The current proposal is that restrictive covenants will be required over land above and adjacent to the tunnel. These activities would include:</p> <ul style="list-style-type: none"> a. development which would require planning permission, deep foundations, piling or influence existing ground conditions. b. changes in ground weight loading (either increasing or decreasing) such as: <ul style="list-style-type: none"> i. any excavation (including boring and future archaeological research) below a depth of 1.2m in the area shown in light blue and below a depth of 0.6m in the area shown in dark blue in Appendix A [REP2-025];

Ref	Wiltshire Council LIR Comment	Highways England Response
		<ul style="list-style-type: none"> ii. any additional loading as a result of building work or storage; iii. use by any vehicles of greater weight than for standard road use vehicles; or iv. any new tree planting or removal. <p>Where archaeological research is identified requiring activity restricted by the above proposed terms (such as by requiring excavations deeper than 0.6m or 1.2m, depending on the location), the restrictive covenants would require consultation with Highways England in order to analyse on a case by case basis and determine to what extent the proposed archaeological works may be permitted. It is therefore not the intention of the restriction to compromise and potentially prevent both future archaeological research within the WHS, and also works necessary to the conservation and protection of sites and monuments that convey its attributes of OUV, but to create a mechanism to allow archaeological research to continue, but also allow Highways England the ability to protect the integrity of the tunnel.</p> <p>Highways England acknowledges Wiltshire Council’s concerns regarding the tunnel restriction areas and is undertaking further work to provide details of the type of restrictions required and will continue to consult Heritage partners. This will be documented within statements of common ground.</p>
4.18	Western Section: Winterbourne Stoke Bypass to Longbarrow Junction - The proposed deposition of chalk from the tunnel in this location would	The Draft Detailed Archaeological Mitigation Strategy [DAMS, REP2-038] indicates that “Landscape fill areas are proposed along the Winterbourne Stoke Bypass; excavated material

Ref	Wiltshire Council LIR Comment	Highways England Response
	<p>negatively impact on a number of known archaeological features, including settlement and burial features from prehistoric and Roman times.</p>	<p>deposition is proposed at Parsonage Down East, northwest of Winterbourne Stoke. In accordance with item MW-CH5 of the OEMP (Outline Environmental Management Plan) [APP-187], the Main Works (MW) contractor will prepare a Method Statement ... setting out how it intends to preserve in situ sensitive archaeological remains and prevent deformation of topsoil/ subsoil horizons (including no-dig solutions). Preservation in situ will be the preferred mitigation option where the proposed fill depth is <2m and topsoil is to be retained in situ (subject to load calculations ... Where the fill depth is >2m, topsoil will be removed prior to deposition of fill material. Archaeological mitigation will include archaeological excavation and recording, ploughzone artefact collection, trial trench evaluation, archaeological topographic survey.” [REP2-038, para. 4.2.8-9].</p> <p>The Draft DAMS notes that “A combination of suitable fill material and a suitable barrier membrane will be used to bury and protect sites to ensure that they are not disturbed at construction and to preserve them for future generations. Existing topsoil will be left in place. During the detailed design stage, the design team will liaise with the TPA (Technical Partner’s Archaeologist) to ensure that the intended loading values will not affect buried archaeological remains. The TPA will consult with HMAG/ WCAS and the Historic England Science Advisor (South West). On-site monitoring of fill areas will be the responsibility of the ACoW (Archaeological Clerk of Works) during the PW (Preliminary Works) and MW (Main Works) stages; this will be set out in the CEMP (Construction Environmental Management Plan).” [REP2-038, para. 4.3.11].</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>“National guidance for preservation in situ sites is provided in, Preserving Archaeological Remains. Decision-taking for Sites under Development. Stages of assessment to determine the potential impact of compression could include, as necessary:</p> <ul style="list-style-type: none"> • baseline assessment of current conditions and stability of archaeological remains; • develop a geotechnical engineering model of compression effects; • develop a project design for the preservation in situ sites; and • carry out monitoring and remedial works to rectify any identified issues.” [REP2-038, para. 4.3.12]. <p>“Regular monitoring visits will be undertaken during Phase 3 by the ACoW to ensure that archaeological sites protected at the start of Phase 1 will not be impacted during construction. This will include sites to be protected beneath fill (excavated material deposition areas and landscape fill areas, and areas to be protected by no-dig solutions such as haul roads, temporary roads required for traffic management, NMU (Non-Motorised User) and PMA (Private Means of Access) routes and compound areas).” [REP2-038, para. 6.3.1].</p>
4.19	Green Bridge No 4- The length of cover given to the proposed road cutting within the western part of the WHS may not be sufficient, subject to further	Highways England disagree with Wiltshire Council’s stance. Along with considerations of cost, the location and design of the tunnel portals have been optimised in terms of the natural

Ref	Wiltshire Council LIR Comment	Highways England Response
	<p>submissions, to mitigate potential adverse visual impacts caused by the cutting on key monument groups with attributes of OUV, most notably the Winterbourne Stoke, Diamond Group and Normanton Down Group. Further diagrams illustrating where the cutting will be seen from has been requested to help determine the impact.</p>	<p>topography of the area, impact within the WHS and the extent of benefit that will be secured by one of the key aims of the Scheme which is to remove the sight and sound of the A303 traffic from much of the WHS landscape. With accompanying mitigation, the assessments show that the preferred solution is a 2-miles (3.3km) long tunnel extending between portals located adjacent to the existing A303 to the east of The Avenue and to the west of Normanton Down.</p> <p>The Preferred Route Announcement (PRA) by the Secretary of State in September 2017 was based on a 2.9km long twin bored tunnel. The western portal was located south of the existing A303 and northwest of Normanton Gorse and the eastern portal to the north of the A303 and east of the Avenue. Since the PRA, during the Scheme development, and in response to consultation responses, the applicant has amended the Scheme to extend the tunnel. Two changes were made to the location of the western portal which resulted in a 300m extension to the tunnel:</p> <ul style="list-style-type: none"> the end of the bored tunnel was moved 100m west to avoid impact on a scheduled barrow (NHLE No. 1010832 bowl barrow south of the A303 and north west of Normanton Gorse) that contributes to the OUV of the WHS; and a 200m cut-and-cover extension, or canopy, was added for improvement in landscape and visual connectivity and tranquility within the WHS. <p>At the eastern end a cut-and-cover extension of 85m has been added to suit the topography for improvement in landscape and visual connectivity and tranquility within the WHS. Further westwards extensions of the tunnel were ruled out because of</p>

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		<p>topographical and technical constraints, and because they would not deliver sufficient additional benefits to justify the additional cost. Highways England has designed a scheme that removes the surface A303, and the accompanying sight and sound of traffic on it from a large proportion of the WHS enabling beneficial change to the setting of many monuments and asset groups that contribute to the OUV of the WHS, particularly within the central part of the WHS surrounding Stonehenge. The Scheme has been sensitively designed with the use of a 2 mile long tunnel, retained deep road cuttings, essential chalk grassland mitigation to enable landscape integration, a 150m long Green Bridge No. 4 to enable visual and physical landscape connectivity and public access, canopies and hidden tunnel portals within the WHS landscape.</p> <p>The Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole. This takes into account that of the seven attributes of OUV for the WHS, whilst the Scheme will have a slight adverse effect on two of those attributes, it will have a beneficial effect on the remaining five (being a slight beneficial effect on 3 of the attributes, a large beneficial effect on one, and a very large beneficial effect on one). This conclusion also takes into account that the Scheme will have a slight beneficial effect on the authenticity and integrity of the WHS. Overall, the OUV of the WHS would be sustained.</p> <p>With reference to AG12 Winterbourne Stoke Crossroads Barrows, both the A303 and the A360, including the existing Longbarrow Roundabout, will be removed from immediately adjacent to the asset group. The A303 will move 150m to the south and be built in cutting to remove the sight and sound of</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>traffic from immediately adjacent to the asset group. The benefits of this are clearly demonstrated by the photomontages and CGIs presented in the ES Chapter 6, Appendix 6.9 [APP-218] (Figure 4, Figure 5 and Figure 7). With regards to AG13 Diamond Group, the A360 currently bisects the group and the A303 additionally severs the group from AG12 Winterbourne Stoke Crossroads Barrows to the north. The Scheme design removes traffic and severance from within the asset group by realigning the A360 and Longbarrow junction further to the west. Green Bridge No. 4 maintains visual and physical landscape connectivity with AG12 Winterbourne Stoke Crossroads Barrows to the north and access between the two groups via new NMU routes, and this combined with the essential chalk grassland mitigation, improves the visitor’s ability to appreciate the setting, in the context of reduced views and sounds of traffic.</p> <p>Regarding AG19 Normanton Down Barrows, the Scheme would remove the existing A303 surface road to the north of the asset group, which severs its relationship with Stonehenge as well as many other asset groups to the north of the A303, including AG12 Winterbourne Stoke Crossroads Barrows. The Scheme would restore the setting of much of the AG19 Normanton Down Barrows, its sense of place, and visitor’s ability to appreciate them within a seamless landscape, noting that long distance views from the northern end of the asset group will include minor intrusion from the western approach cutting and Green Bridge No. 4. Amongst other benefits of the restored setting of AG19 Normanton Down Barrows would be the enhanced access, enabling an uninterrupted traverse between Stonehenge and the</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>Normanton Down Barrows along Byways 11 and 12. The removal of the adverse visual and audible impacts of traffic would be beneficial to the setting of the asset group as a whole. Views from numerous individual monuments within the asset group would be improved, and compromised sightlines restored. These include key views, including those between the Sun Barrow and Stonehenge, and between Stonehenge and the core of the Normanton Down asset group. From the core of the group, traffic would not be visible, while traffic noise would be significantly reduced.</p> <p>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.</p> <p>Green Bridge No.4 was moved eastwards and widened from 50m to approximately 150m in order to provide greater physical and visual 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</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>part of the WHS. The retained cutting in the western approaches allows visual connectivity to be maintained between the Winterbourne Stoke Crossroads Barrows, the Diamond Group and the Normanton Down Barrows that contribute to the OUV of the WHS, as agreed with heritage stakeholders. The design of the retained cutting incorporates an upper grassed slope and chalk grassland mitigation to the north and south. This allows the cutting to blend into the surrounding landscape from key views between monument groups.</p> <p>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 A360 route. The location and scale was agreed with heritage stakeholders.</p> <p>Highways England will, however, continue to work with Wiltshire Council to alleviate their concerns, and consult with them during the development of the detailed design.</p>
4.20	<p>The proposed western portal approach road’s new infrastructure will impact on the setting of monuments and create new severance within the WHS. Although some mitigation measures can be built in to minimise impacts, the potential adverse impacts cannot be removed completely. It is considered that this negative impact will result in a</p>	<p>Highways England met with WCAS on the 12th December 2018 to discuss the Statement of Common Ground and review the photomontages and CGIs that were submitted with the ES Chapter 6, Appendix 6.9 [APP-218] and explained the views in more detail in order to try to alleviate Wiltshire Council’s concerns and correct any misunderstandings.</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
	<p>permanent adverse impact as specified within the ES.</p>	<p>Construction phase (temporary) setting effects</p> <p>ES Chapter 6, Cultural Heritage, notes that during the construction phase (temporary), “The Winterbourne Stoke Crossroads barrows (Asset Group 12) would experience a negative change to setting, although that setting would continue to be dominated by traffic on the existing highways, with construction occurring behind that screen. Impacts vary according to each monument’s proximity to the Scheme and the presence of screening trees, but the effect from temporary construction activities is considered to be Large adverse across the group as a whole.” [APP-044, para. 6.9.14]. “A Moderate adverse effect is predicted for all of the components of this group, except for the upstanding long barrow NHLE 1010830, for which the effect would be Large adverse” [APP-044, para. 6.9.15].</p> <p>Construction phase (permanent) setting effects</p> <p>Non-significant adverse construction phase (permanent) effects arising from changes to setting are recorded for AG13 (Diamond Group) [APP-044, para. 6.9.31]. However, permanent setting effects on the Winterbourne Stoke Crossroads Barrows) are assessed as Moderate and Large beneficial due to the positive influence upon setting, because of the greater physical separation between the monuments within the group and the A303 and A360, the reduced visual impact of roads and</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>associated infrastructure, and restored or enhanced sightlines with other monument groups. Similarly, the Normanton Down Barrows (AG19) will experience Moderate and Large beneficial permanent construction phase effects [APP-044, Table 6.11].</p> <p>Operation phase (permanent) setting effects</p> <p>Non-significant Adverse effects are assessed for AG13 (Diamond Group) [APP-044, para. 6.9.36]. Permanent operation setting effects for the Winterbourne Stoke Crossroads barrows (Asset Group 12) are assessed as Moderate beneficial, and for the Normanton Down Barrows (AG19), Moderate and Large beneficial [APP-044, Table 6.12].</p> <p>Highways England, therefore, disagree that this new infrastructure will result only in a significant permanent adverse effect - although some non-significant permanent adverse effects arise, it also results in significant beneficial effects.</p> <p>The Scheme has been sensitively designed with the use of retained deep road cuttings, essential chalk grassland mitigation to enable landscape integration, a 150m long Green Bridge No. 4 to enable visual and physical landscape connectivity and public access, canopies and hidden tunnel portals within the WHS landscape.</p> <p>The Scheme is assessed to have a Slight Beneficial effect on the OUV of the WHS as a whole. This takes into account that of the seven attributes of OUV for the WHS, whilst the Scheme will have a slight adverse effect on two of those attributes, it will have a beneficial effect on the remaining five (being a slight beneficial effect on 3 of the attributes, a large beneficial effect on one, and</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>a very large beneficial effect on one). This conclusion also takes into account that the Scheme will have a slight beneficial effect on the authenticity and integrity of the WHS. Overall, the OUV of the WHS would be sustained.</p> <p>With reference to AG12 Winterbourne Stoke Crossroads Barrows, Highways England disagree with Wiltshire Council’s conclusion that the impacts from the Scheme on this asset group should be assessed as slight adverse as both the A303 and the A360, including the existing Longbarrow Roundabout, will be removed from immediately adjacent to the asset group. The A303 will move 150m to the south and be built in cutting to remove the sight and sound of traffic from immediately adjacent to the asset group. The benefits of this are clearly demonstrated by the photomontages and CGIs presented in the ES Chapter 6, Appendix 6.9 [APP-218] (Figure 4, Figure 5 and Figure 7).</p> <p>With regards to AG13 Diamond Group, the A360 currently bisects the group and the A303 additionally severs the group from AG12 Winterbourne Stoke Crossroads Barrows to the north. The Scheme design removes traffic and severance from within the asset group by realigning the A360 and Longbarrow junction further to the west. Green Bridge No. 4 maintains visual and physical landscape connectivity with AG12 Winterbourne Stoke Crossroads Barrows to the north and access between the two groups via new NMU routes, and this combined with the essential chalk grassland mitigation, improves the visitor’s ability to appreciate the setting, in the context of reduced views and sounds of traffic. However, Highways England agree with</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>Wiltshire Council that the Scheme will result in a permanent adverse impact on this Asset Group.</p> <p>Regarding AG19 Normanton Down Barrows, the Scheme would remove the existing A303 surface road to the north of the asset group, which severs its relationship with Stonehenge as well as many other asset groups to the north of the A303, including AG12 Winterbourne Stoke Crossroads Barrows. The Scheme would restore the setting of much of the AG19 Normanton Down Barrows, its sense of place, and visitor's ability to appreciate them within a seamless landscape, noting that long distance views from the northern end of the asset group will include minor intrusion from the western approach cutting and Green Bridge No. 4. Amongst other benefits of the restored setting of AG19 Normanton Down Barrows would be the enhanced access, enabling an uninterrupted traverse between Stonehenge and the Normanton Down Barrows along Byways 11 and 12. The removal of the adverse visual and audible impacts of traffic would be beneficial to the setting of the asset group as a whole. Views from numerous individual monuments within the asset group would be improved, and compromised sightlines restored. These include key views, including those between the Sun Barrow and Stonehenge, and between Stonehenge and the core of the Normanton Down asset group. From the core of the group, traffic would not be visible, while traffic noise would be significantly reduced.</p> <p>Highways England will continue to work with Wiltshire Council to alleviate their concerns, and consult with them during the development of the detailed design.</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
4.21	<p>Central Section: Within the WHS The Cutting in the WHS on Western Approach to Tunnel - The proposed new length of expressway within the WHS will be damaging to below ground archaeological features and to the visual setting of monuments and groups of monuments in the WHS.</p>	<p>With regard to impacts and effects on the setting of monuments and groups of monuments in the WHS, please see answer to 6.19.</p> <p>With regard to impacts and effects on below ground archaeological features, the preferred route was carefully chosen to minimise effects on archaeology and to avoid known archaeological remains, important sites and monuments (having regard to the WHS as a whole).</p> <p>The development consent application for the Scheme is accompanied by an unprecedented level of detail of investigation of the area of the WHS covered by the Scheme in accordance with an archaeological evaluation strategy developed in consultation with HMAG and with input from the Scientific Committee. This has comprised up-to-date geophysical survey of the full red line boundary, ploughzone artefact sampling across all areas evaluated, and trial trenching of up to 10% by area, building on and augmenting the results of more than 25 years of previous investigations in connection with the A303, and taking into account the emerging results of academic research programmes undertaken over the last decade.</p> <p>The draft Detailed Archaeological Mitigation Strategy (DAMS) [REP2-038], takes account of the full and comprehensive archaeological evaluation findings, which followed a staged and iterative approach. The DAMS sets out the structured, iterative detailed archaeological mitigation strategy. The DAMS is being developed in consultation with the Heritage Monitoring Advisory</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>Group (which includes Wiltshire Council) and the Scientific Committee. It will be finalised prior to the end of the Examination and is secured by Requirement 5 of Schedule 2 of the draft Development Consent Order [REP2-003]. The DAMS is rooted in a heritage research-led framework [REP2-038; Section 2].</p> <p>Archaeological considerations have been afforded the highest priority throughout the development of the Scheme, informing the choice of preferred route and influencing the design of the Scheme. This comprehensive programme of archaeological evaluation surveys has informed the Scheme being designed in a way that has limited any direct physical impacts on archaeology as far as practicable. Examples of how the design has been developed to limit these impacts on archaeology include, but are not limited to, the choice of a northern bypass of Winterbourne Stoke, the reduced footprint and land take for Rollestone Corner, and the design and placement of the western and eastern tunnel portals and portal approaches in areas that have been shown to have limited archaeological remains within their footprint. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9.</p> <p>The majority of archaeological works are being undertaken in the Preliminary Works phase to mitigate against the risk of unforeseen finds being located within the Main Works. Archaeological remains would be excavated and recorded during the Preliminary Works phase, in advance of construction, to avoid, as far as is practicable, previously unknown archaeological remains being uncovered during construction. In line with paragraph 5.1.10 of the draft DAMS, if unexpected finds</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>(sites, artefacts, environmental remains or ecofacts, monuments or features) were made during the Preliminary Works or Main Works stages a site consultation meeting(s) would be convened between the Archaeological Contractor, HMAG / WCAS and the Technical Partners' Archaeologist to consider the significance of the finds. Depending on the outcome of the consultation meeting, an addendum to the Site Specific Written Scheme of Investigation or a new Site Specific Written Scheme of Investigation would be prepared by the Archaeological Contractor for approval by the Technical Partners' Archaeologist, in consultation with HMAG / WCAS.</p> <p>The mitigation measures proposed in the DAMS take an appropriately precautionary approach, having full regard to the results of the assessments undertaken in the ES and the HIA, and informed by a comprehensive programme of archaeological evaluation surveys.</p>
4.22	<p>South of A303 / Solstice Park – The proposed new route between Allington Track and Equinox Drive includes a divergence of the AMES 1 byway that cuts across an area which has known archaeological features and has not been subject to archaeological evaluation and assessment. This needs to be undertaken and mitigation measures proposed in order for this to be acceptable.</p>	<p>The area proposed for diversion of Amesbury Road (byway AMES1) (land off Equinox Drive, Solstice Park, Amesbury) has been subject to geophysical survey [REP1-055, Report 10 - Amesbury Road Diversion]. The land had previously been included in a programme of non-intrusive archaeological geophysical survey and trial trenching in connection with the Solstice Park development (see the Environmental Statement submitted with the Application for Development Consent dated October 2018 (ES) paragraph 6.6.109). The conclusions of the ES were informed by the results of that geophysical survey and trial trenching, allowing a robust assessment of baseline, (see ES paragraphs 6.6.15 and 6.6.109), approach to mitigation (see</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>ES section 6.8) and likely significant effects (see ES paragraph 6.4.1 (f) and section 6.9 and tables 6.10 to 6.12). The purpose of the Amesbury Road Diversion geophysical survey [REP1-055] was to confirm the results of the previous survey and trenching and therefore the conclusions of the Environmental Statement.</p> <p>The Amesbury Road Diversion geophysical survey report notes that:</p> <p><i>“The geophysical survey has not identified any anomalies that can be confidently interpreted as archaeology. A possible ditch feature may represent an extension of a Bronze Age – Romano-British field system recorded across the area. However, this could equally relate to more recent activity on the site, evident on satellite imagery.</i></p> <p><i>The survey also identified several possible pit features. Whilst these may relate to archaeological activity, they are equally likely to be natural pitting in the underlying chalk bedrock. The remaining anomalies are modern in origin. These relate to a service and ferrous debris likely associated with the construction activity to the north of the site.</i></p> <p><i>Based on the results of the geophysical survey and consultation with Wiltshire County Archaeology Service, it was concluded that the archaeological evaluation trenching proposed in the Site Specific Written Scheme of Investigation (SSWSI) was not required. The survey evaluated in this report confirms the results of the previous survey and trenching and therefore confirms the conclusions of the Environmental Statement.” [REP1-055, p. 2].</i></p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>The Draft DAMS [REP2-038, para. 3.3.95] notes that “To the east of Amesbury, the Scheme will include stopping up of the direct connection between Allington Track and the A303 and stopping up a length of byway AMES1 (Amesbury Road) south of its junction with A303. Allington Track will be linked to Equinox Drive within Solstice Park by a new length of highway 5.5 metres wide with passing places. Byway AMES1 (Amesbury Road) will have a new connection to the southern end of Equinox Drive. The section of byway between this new connection and the new Allington Track link will be stopped-up. The section of byway between the new Allington Track link and the A303 will be converted to a public footpath to maintain public access to view the scheduled monument at the junction of AMES1 with A303.”</p> <p>The Draft DAMS notes that “Diversion of the Amesbury Road (byway AMES1) to connect Allington Track to Equinox Drive will require construction of a short length of new road across land west of the scheduled monuments at site 32.1”, the site of two disc barrows and a bell barrow, 400m east of the Pennings, Earl's Farm Down (UID 4059; NHLE 1009566). “Allington Track will be upgraded within existing boundaries. The junctions between Amesbury Road and the A303 and Allington Track and the A303 will be stopped up.” The Draft DAMS indicates that the proposed mitigation is that the site will be “photographed and protected during construction works by fencing. The protective fencing will incorporate a 10m buffer beyond the extent of the scheduled area as mapped by Historic England. Following construction, the protective fencing will be removed and the land returned to agriculture.” [REP2-038, Site 32: Barrows east of Solstice Park, p. 179].</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
4.23	<p>Asset groups in the western part of the WHS - The adverse impact on Asset Group (AG) 13, the Diamond Group AG12 the Winterbourne Stoke Group and AG 19 Normanton Down causes concern. The cutting will be seen by these monuments and will be detrimental to the visual relationship between them. These groups have highly significant Neolithic long barrows all of which display attributes of OUV.</p>	<p>Highways England met with WCAS on the 12th December 2018 to discuss the Statement of Common Ground and review the photomontages and CGIs that were submitted with the ES Chapter 6, Appendix 6.9 [APP-218] and explained the views in more detail in order to try to alleviate Wiltshire Council’s concerns and correct any misunderstandings.</p> <p>With reference to AG12 Winterbourne Stoke Crossroads Barrows, Highways England disagree with Wiltshire Council’s conclusion that the impacts from the Scheme on this asset group should be assessed as slight adverse as both the A303 and the A360, including the existing Longbarrow Roundabout, will be removed from immediately adjacent to the asset group. The A303 will move 150m to the south and be built in cutting to remove the sight and sound of traffic from immediately adjacent to the asset group. The benefits of this are clearly demonstrated by the photomontages and CGIs presented in the ES Chapter 6, Appendix 6.9 [APP-218] (Figure 4, Figure 5 and Figure 7).</p> <p>With regards to AG13 Diamond Group, the A360 currently bisects the group and the A303 additionally severs the group from AG12 Winterbourne Stoke Crossroads Barrows to the north. The scheme design removes traffic and severance from within the asset group by realigning the A360 and Longbarrow junction further to the west. Green Bridge No. 4 maintains visual and physical landscape connectivity with AG12 Winterbourne Stoke Crossroads Barrows to the north and access between the two groups via new NMU routes, and this combined with the essential chalk grassland mitigation, improves the visitor’s ability</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>to appreciate the setting, in the context of reduced views and sounds of traffic.</p> <p>Regarding AG19 Normanton Down Barrows, the scheme would remove the existing A303 surface road to the north of the asset group, which severs its relationship with Stonehenge as well as many other asset groups to the north of the A303, including AG12 Winterbourne Stoke Crossroads Barrows. The scheme would restore the setting of much of the AG19 Normanton Down Barrows, its sense of place, and visitors' ability to appreciate them within a seamless landscape, noting that long distance views from the northern end of the asset group will include minor intrusion from the western approach cutting and Green Bridge No. 4. Amongst other benefits of the restored setting of AG19 Normanton Down Barrows would be the enhanced access, enabling an uninterrupted traverse between Stonehenge and the Normanton Down Barrows along Byways 11 and 12. The removal of the visual and audible impacts of traffic would be beneficial to the setting of the asset group as a whole. Views from numerous individual monuments within the asset group would be improved, and compromised sightlines restored. These include key views, including those between the Sun Barrow and Stonehenge, and between Stonehenge and the core of the Normanton Down asset group. From the core of the group, traffic would not be visible, while traffic noise would be significantly reduced.</p> <p>Highways England notes that there is a group of Neolithic long barrows in the western section of the Scheme along with other</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
		<p>burial mounds that cluster around them. Impacts on these heritage assets and Asset Groups are considered in ES Chapter 6, Cultural Heritage [APP-044] and the Heritage Impact Assessment (ES Chapter 6, Cultural Heritage, Appendix 6.1) [APP-195, in particular paragraphs 9.3.1-9.3.3 that considers the long barrow groupings].</p> <p>The preferred route for the Scheme was selected to avoid known archaeological remains, important sites and monuments. Subsequent design development at the western tunnel approach, including mitigation measures to limit or avoid impacts, has been informed by a comprehensive programme of archaeological evaluation surveys, which have confirmed the limited nature of the archaeological remains within the construction footprint for the Western Portal and its approach cutting [see APP195, paragraphs 6.3.4 – 6.3.12]. Further information can be found in the Assessment of Alternatives, ES Chapter 3 [APP-041] and in ES Chapter 6, Cultural Heritage [APP-044], Section 6.8, Table 6.9.</p> <p>Highways England will continue to work with Wiltshire Council to alleviate their concerns, and consult with them during the development of the detailed design.</p> <p>Please also see response LIR 4.20.</p>

Table 4-7: Archaeology and WHS Considerations: Extant Opportunities

Ref	Wiltshire Council LIR Commenta	Highways England Response
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4.24	<p>Although the proposed removal of the A303 from the surface will bring many benefits to the centre of the WHS, the western portal and expressway in cutting will harm the setting of key monuments and their interrelationship in the western part of the WHS. With the current Scheme the opportunity has been missed to extend the tunnel within the WHS (either bored or cut and cover) thereby minimising the impact on the OUV. A longer tunnel would be better aligned with Policy 3c in the WHS Management Plan to maintain and enhance the setting of monuments and sites in the landscape and their interrelationships and astronomical alignments with particular attention given to achieving an appropriate landscape setting for the monuments and the WHS itself.</p>	<p>The locations of the eastern and western portals in the proposed Scheme have been identified as the optimum locations when all environmental, technical and economic considerations are taken into account. There is no evidence that the additional investment required to extend the tunnel length would deliver meaningful additional benefits to the WHS that would justify the additional cost. Further detail of the longer tunnel alternative can be found in Highways England's response to Written Question AL.1.29 [REP2-024] submitted at Deadline 2.</p> <p>At Preferred Route Announcement (PRA) the east portal location was determined to avoid the Scheduled Monument known as the Avenue (NHLE 1010140). This location has been retained as the eastern end of the bored tunnel and a further 85m of cut and cover tunnel has been added to better suit existing topography for the reasons explained in paragraphs 4 and 5 above.</p> <p>At PRA the west portal was located north west of Normanton Gorse at a position which gave a 2.9km tunnel length. During design development the following changes were identified as beneficial to reflect ICOMOS recommendations.</p> <ul style="list-style-type: none"> • A 100m bored extension westwards to avoid a scheduled monument: a Bowl barrow south of the A303 and north west of Normanton Gorse (NHLE 1010832). • A cut and cover extension of 200m at the western portal to better suit the topography, enable shallower approach cuttings to the tunnel entrance (see paragraphs 4 and 5 above) and to aid landscape integration.
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		<ul style="list-style-type: none"> • A 150m long land bridge was included in the Proposed Scheme to provide physical and visual connectivity between the Winterbourne Stoke Crossroads Barrows and the Diamond Group. <p>The combined effect of the changes set out above (as well as an 85m cut and cover at the eastern portal) was to increase the tunnel length from 2.90km to 3.285km, an increase of 385m or nearly ¼ mile. Further description of these portal locations is included in Chapter 2 of the ES chapter 2 [APP-040], paragraphs 2.3.15 (West Portal) and 2.3.20 (East Portal).</p> <p>The option to extend the bored tunnel was rejected because consideration of the balance of benefits and disbenefits would not justify the significant additional cost, estimated at £578 million, over and above the cost of the Proposed Scheme. In terms of the impact on OUV for a longer tunnel, that option would have a slightly more beneficial impact than the scheme, but would not avoid all impacts on Attributes that convey the OUV of the WHS. Detailed reasoning is provided in this respect in response to written question AL.1.29 [REP2-024].</p> <p>The Scheme has been carefully designed in order to improve the setting of many heritage assets and asset groups in the central part of the WHS. The removal of the existing A303 surface road, which currently has a major adverse impact on the OUV of the WHS, from a large part of the WHS landscape will result in extensive benefits for the WHS, including beneficial effects on the setting of many heritage assets within the WHS through significant reductions in (a) traffic noise, as set out in ES Chapter 9 [APP-047], Section 9.9, and illustrated</p>
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		<p>in Figure 9.4 [APP-167]; and (b) visual intrusion, as set out in ES Chapter 7 [APP-045], Section 7.9.</p> <p>Archaeoastronomical aspects are also considered in the Heritage Impact Assessment, set out in the Environmental Statement, Chapter 6, Cultural Heritage, Appendix 6.1, Section 6.15 [APP-195] and Annex 5 [APP-200], which highlights the astronomical aspects that contribute to the Outstanding Universal Value of the WHS. These are all considered and assessed in the Heritage Impact Assessment with reference to the Scheme, including the location of the eastern portal and its entrance. With regards to Attribute 4 of OUV of the WHS, the design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy, the Heritage Impact Assessment concludes that the Scheme would result in a Large Beneficial Effect (ES Chapter 6, Cultural Heritage, Appendix 6.1, paragraphs 9.4.24-9.4.28) [APP-195].</p>
<p>4.25</p>	<p>The inclusion of the closure of Byways 11 and 12 to motorised traffic in the Scheme would have helped to deliver Policy 6b of the WHS Management Plan - Manage vehicular access to byways within the WHS to avoid damage to archaeology, improve safety and encourage exploration of the landscape.</p>	<p>The 2015 WHS Management Plan’s Policy 6b is to “Manage vehicular access to byways within the World Heritage Site to avoid damage to archaeology, improve safety and encourage exploration of the landscape on foot whilst maintaining access for emergency, operational and farm vehicles and landowners.”, noting that “On-going issues related to vehicle use include direct physical damage to archaeology, negative impacts on the setting of monuments and the wider landscape through illegal parking, impacts on other users and safety at junctions of BOATs with main roads.” (Simmonds & Thomas 2015, para. 11.4.1). As stated previously, changing the status of the existing BOATs is beyond the scope of the Scheme and is a matter for Wiltshire Council to consider as the local</p>

		<p>highway authority. Highways England does not therefore propose to speculate on the impact of this in relation to delivery of the Management Plan.</p> <p>Highways England acknowledges the consideration by Wiltshire Council of its duties under section 130 Highways Act 1980 and notes that Wiltshire Council has recently sought its own powers to close byways 11 and 12 under an Experimental Traffic Order.</p> <p>In relation to the change in status of the existing A303, the Applicant notes that section 130 states:</p> <ol style="list-style-type: none"> 1. It is the duty of the highway authority to assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority, including any roadside waste which forms part of it. 2. Any council may assert and protect the rights of the public to the use and enjoyment of any highway in their area for which they are not the highway authority, including any roadside waste which forms part of it. 3. Without prejudice to subsections (1) and (2) above, it is the duty of a council who are a highway authority to prevent, as far as possible, the stopping up or obstruction of— <ol style="list-style-type: none"> a. the highways for which they are the highway authority, and b. any highway for which they are not the highway authority, if, in their opinion, the stopping up or obstruction of that highway would be prejudicial to the interests of their area.
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		<p>There is no reference to 'mitigation measures' within this wording. The concern is therefore relevant to the references in paragraphs (2) and (3) to Wiltshire Council's duties with regards to 'highway in the area for which they are not the highway authority', which is currently the case for the existing A303. Here, Wiltshire Council may prevent 'as far as possible' any stopping up or obstruction that 'would be prejudicial to the interests of their area'.</p> <p>Notwithstanding that the DCO proposals at this location are not a 'stopping up' in Highways Act terms, even if it was considered that this section generally applied to the proposals: as the proposal is being brought forward as part of the DCO proposals, Wiltshire's engagement in the Examination is 'as far as possible' that the Council will be able to meet their duties under section 130; and</p> <p>neither Wiltshire Council (nor any other party) has claimed that the proposals would be 'prejudicial to the interests of their area' (particularly in light of Wiltshire Council having previously brought forward the Experimental Traffic Order for byways 11 and 12).</p> <p>The extinction of rights to vehicular users proposed through the DCO therefore does not form a risk to Wiltshire Council's duties under section 130(1) or (3) of the Highways Act 1980. Nor does it oblige Wiltshire to exercise the discretionary powers which section 130(2) provides.</p> <p>The proposals brought forward change the existing A303 at this location from a highway open to all traffic to a restricted byway. "Byway (open to all traffic) 11" (made up of components a) and b) as stated) will be stopped up close the</p>
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		<p>existing A303 and a new restricted byway created in its place. This will have the effect of creating a cul-de-sac for mechanically propelled vehicles travelling north. All other users will be able to travel between “Byway 11” and the restricted byway created along the A303. As defined in the DCO, 'restricted byway' has the same meaning as in Part 2 of the Countryside and Rights of Way Act 2000, which, at section 48(4) defines a restricted byway as facilitating rights for persons on foot, horseback or leading a horse and for vehicles other than mechanically propelled vehicles.</p> <p>This change therefore means that a prohibition of driving restriction is not required, either within the DCO or to be brought forward by Wiltshire Council.</p> <p>“Byway (open to all traffic) 12” (made up of components d), e), f), g) and h) as stated) remains unaffected by the scheme proposals.</p> <p>Wiltshire Council would remain the highway and traffic authority for byways 11 and 12 and for the new restricted byway that would replace the existing A303, and the Scheme does not impede Wiltshire Council in the lawful exercise of its functions to prohibit driving (except for motorcycles if it so desired) on AMES 11 and 12, or to permit motorcycles on the restricted byway, should it choose to do so.</p>
<p>4.26</p>	<p>Western bypass-Oatlands Hill – Consideration could be given to designing the layout of the new junction and dumbbell roundabout, to minimise impact on the Bronze Age and Iron Age settlement remains, preserving as much of them as possible.</p>	<p>Alternative layouts for Longbarrow Junction, and associated variations of these, were considered to avoid a direct impact to the C-Shaped enclosure. The shortlisted options produced from that process were further assessed, as summarised within the response to Wiltshire Council’s Relevant Representation (Chapter 19 (RR-2365), AS-026) and recorded</p>

		<p>under “Matters Under Discussion in Relation to Cultural heritage” in the Wiltshire Council Statement of Common Ground [REP2-018], as well as Chapter 3 of the ES [APP-041]. However, all alternative options were rejected for a variety of reasons, most notably; direct impacts on land take within the WHS, increased visual impacts from the WHS, potential implications to road safety and driver behaviour with an increased likelihood of rat running using local roads.</p>
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5 Local Transport

Table 5-1: Local Transport: Positive Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None identified	

Table 5-2: Local Transport: Positive Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
5.01	As a result of quicker journey times being achievable using the A303, anticipated material reductions in traffic flows are forecast to occur on the Packway and London Road Shrewton.	Noted.
5.02	The A360 south of Airmans will experience a significant reduction (compared with existing flows) of circa 2300 vehicles per day (vpd), which will reflect quicker journey times being achieved on the A303.	Noted.
5.03	The proposed changes to Allington Track will remove its (very substandard) junction with the A303 and improve access from Allington / Boscombe / Newton Tony to facilities in and around Amesbury, especially links to employment opportunities to the east side of Amesbury. This closure of the very substandard existing A303 junction is considered to be a significant positive impact of the Scheme.	Noted.
5.04	Forecasts indicate that the London Road peak hour summer flows of 520 vehicles per hour (vph) at 2017 will reach only 190 vph by 2041, a reduction	Noted.

	of some 44%, compared with the Do Nothing scenario, even with general forecast growth over the intervening 24 years.	
5.05	The Scheme alterations will likely result in an improved condition for the delivery of local bus services through Amesbury, Bulford, Durrington, Larkhill and Shrewton as a result of reduced traffic during the hours of congestion on the A303.	Noted.
5.06	To the north of the A303 the A360 flows are forecast to be reduced as a result of the Scheme at 2031.	Noted.
5.07	A360 to the north of the Longbarrow junction - Subject to appropriate signage on the A360 approaches to this junction, it is considered that there will be positive benefits, especially for those drivers unfamiliar with the area, to access the Stonehenge Visitor Centre site on the most appropriate route, and help avoid the missed visit times caused by delays in traffic queues.	Noted.
5.08	A338 - south of its junction with the A346 it forms part of the Primary route network connecting Bournemouth with Swindon. Compared with the Do Minimum situation in 2031 the road is forecast to carry up to circa 200 additional traffic to the north of the A303, but the impacts to the south are marginally positive	Noted.
5.09	Diversion routes for A303 traffic - The routes to the north of the A303 will all experience beneficial impacts in 2031 as a result of the removal of diverting traffic.	Noted.
5.10	Rollestone Crossroads – The associated scheme to amend priorities, with the arm serving Shrewton taking access as a simple priority junction, and the arm serving ‘The Bustard’ road (to the north) in turn taking access from the Shrewton arm, is regarded as having a positive impact insofar as it will discourage use of London Road as a through route, and will prioritise the	Noted.

	busiest link, helping with local traffic flows, especially during periods when traffic is diverted off the A303.	
5.11	The proposed junction at Countess - The separation of A303 traffic will have a positive impact at the junction insofar as the current delays will be minimised, the need to use the underpass to cross the junction (east side) will be removed, and improved provision for pedestrians and cyclists provided.	Noted.
5.12	A3028 - With forecast increased movements at the A3028 junction with the A303, the merge visibility is proposed to be improved by removal of vegetation, so that A303 eastbound traffic has better visibility to entering traffic and vice versa, which should result in an improved collision record at the junction.	Noted.
5.13	Winterbourne Stoke - The proposed improved environmental setting for Winterbourne Stoke is considered to be the principal environmental gain outside the WHS.	Noted
5.14	A345, Countess Road North - which experiences a material increase in traffic between 2017 and 2031 (Do minimum) will see a less significant fall of circa 700 vpd as a result of the Scheme.	Noted.

Table 5-3: Local Transport: Positive Impacts - Neutral Impacts

Ref	Wiltshire Council LIR Comment	Highways England Response
5.15	Traffic increases significantly on the A303 as a result of the proposed Scheme, which is as to be expected as a result of the removal of a significant local bottleneck and as a result of traffic using alternative routes returning to the A303 as well as induced traffic.	Noted.
5.16	The proposed junction at Countess - The roundabout will remain lit as at present; this is seen as a neutral impact.	Noted.
5.17	Longbarrow - The dumbbell roundabout proposal with a single bridge is considered to be an acceptable junction arrangement to facilitate movement to and from the A303 and along the A360.	Noted.

Table 5-4: Local Transport: Negative Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
5.18	Modelling forecasts indicate that the worst of the impacts will occur during Phase 1 (Winterbourne Stoke / Longbarrow and Countess junction) of the main works. The additional journey times along the A303, arising from the necessary traffic management, will result in traffic seeking to use alternative routes, including roads both to the north and south of the A303.	Whilst we acknowledge there will be some increases in journey times as a result of the Scheme construction, these increases are within an acceptable level of tolerance (for both phase 1 and phase 2). Furthermore, the modelling has demonstrated that the increases in journey times will not result in unacceptable increases in traffic on alternative routes. This is set out in Section 9 of the Transport Assessment [APP-297].
5.19	The proposed works to deliver the flyover junction at Countess roundabout, and the excavation and	Wiltshire Council will be consulted on the contents of a Traffic Management Plan (TMP) pursuant to requirement 9 of Schedule

	<p>disposal of arisings associated with the Eastern Portal works will create local impacts on the local road network (including additional works lorry traffic to the A303), which will require some extensive local traffic management.</p>	<p>2 to the draft DCO [APP-020]. Matters to be included in this plan are set out in reference MW-TRA2 of the Outline Environmental Management Plan [APP-147], which include traffic management measures to be implemented and details of traffic management proposals for the works on or adjacent to public roads. In addition at TRA7, the OEMP [APP-147] provides that haul routes will be provided for use by construction vehicles. Compliance with the OEMP is secured by requirement 4 of Schedule 2 to the draft DCO. As such, Wiltshire Council will be able to consider the routes chosen as part of the development of that TMP. This issue is under discussion with Wiltshire Council and progress will be reported in future updates to the Statement of Common Ground.</p>
<p>5.20</p>	<p>There is potential for disruption to local traffic resulting from advance works by statutory undertakers involved in the provision of e.g. power and water supplies to the site. These works, where they affect local roads, will be managed by the Council's Streetworks team in accordance with normal procedures. It is therefore anticipated that the negative impacts will be limited, resulting mainly in peak flow period delays to traffic on affected routes.</p>	<p>Noted.</p>

Table 5-5: Local Transport: Negative Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
5.21	<p>Allington Track is forecast to have traffic volumes nearly double from existing levels as a result of the Scheme. It is considered that the proposed new route might attract lorries to and from Solstice from the A338, and this might represent a severe negative impact, both for the Track itself, but also for residential properties situated adjacent its A338 junction (where there is little space to improve the junction). Modelling work undertaken following submission of the DCO application indicates that there is no forecast capacity issue at the Allington Track / A338 junction as a result of the forecast increased traffic.</p>	<p>As set out in the Statement of Common Ground with Wiltshire Council at section 3.1.8, Highways England has provided additional details confirming that there will be no capacity issues at this junction. Wiltshire Council is satisfied that this will be the case.</p>
5.22	<p>The flows at the London Road / High Street junction, Amesbury Town Centre, have been modelled following concerns raised by the Council; the modelling work forecast that there will be direct impacts resulting from the Scheme adding further congestion to a junction where flows will exceed capacity at times. Options for mitigations are under consideration with a view to local junction alterations being made by HE to help mitigate the impacts. The closure of the A303 Stonehenge Road will result in an increase in traffic using the High Street, and this is a material factor in the capacity issues at the junction.</p>	<p>As detailed in section 3.2.1 of the Statement of Common Ground with Wiltshire Council, Highways England acknowledges capacity issues at the London Road Junction, although it does not accept that these issues are caused solely by the Scheme. The parties are continuing to discuss ways of working together to address Wiltshire Council's concerns at this location.</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
5.23	South of Longbarrow the A360 will see a forecast increase of circa 600 vpd.	Noted. As referenced in Appendix I of the Traffic Forecasting Package (Appendix C of ComMA [APP-301])
5.24	The A345 north of the Durrington roundabout will see an increase of 500 vpd as a result of the Scheme.	Noted. As referenced in Appendix I of the Traffic Forecasting Package (Appendix C of ComMA [APP-301])
5.25	A345 – The route to the south of Amesbury and to the north of Packway will experience increases in traffic, but not so as to cause significant concern, except at the High Street junction, where traffic flows currently experience occasional signal capacity problems, but where flows are forecast to increase fairly significantly.	See response for section 7.22 above
5.26	A338 - The impact to the north of Parkhouse junction is not considered to be other than marginally negative.	Noted. As can be seen from Section 5.4 of the Traffic Forecasting Package (Appendix C of ComMA [APP-301])
5.27	Diversion routes for A303 traffic – The Salisbury Road, linking Solstice junction to Bulford, an adverse impact will involve an additional forecast (2031 flows, Do Minimum compared with Do Something scenarios) of 900 vpd. This is not considered to be an impact requiring specific mitigation.	Noted. Details of the changes in traffic flows in this area are detailed in the Transport Assessment paragraphs 6.3.19 and 6.3.20 [APP-297]

Ref	Wiltshire Council LIR Comment	Highways England Response
5.28	<p>The proposed junction at Countess - Raising the road in the vicinity of some local residential properties will represent a negative impact, because of the potential noise emanating from fast moving A303 traffic at height, needing to be addressed by sound barrier systems of appropriate efficacy.</p>	<p>The Noise and Vibration Chapter of the Environmental Statement (ES) [APP-047] identifies negligible and minor (not significant) changes in operational traffic noise levels at receptors in the vicinity of Countess flyover.</p> <p>The adverse effects of the operation of the Countess flyover have been mitigated through the incorporation of mitigation measures into the design, primarily the use of a thin surfacing system which results in lower levels of noise generation than a standard hot rolled asphalt surface at speeds at and above 75km/hr and inclusion of 1.8m high absorptive noise barriers between the slip roads on both the north and south side of Countess flyover.</p>
5.29	<p>An unwanted consequence of the removal of the bottleneck at Stonehenge will be that the first point at which the dual carriageway, west of the M3 becomes single carriageway will be displaced to the next dual to single merge at Wylde, just west of the Deptford interchange with the A36. This merge is likely to result in significant queue situations at similar seasons and times as those experienced currently at and around Stonehenge. These might be anticipated to be similar to currently experienced queues at lane reductions on the Ilminster Bypass and at the merge east of Podimore roundabout.</p>	<p>Potential impacts have been appropriately reflected in assessing the scheme benefits. Traffic forecasts reflect the constraints from remaining single carriageway sections and at-grade roundabouts along the corridor. The Combined Modelling and Appraisal Report - Appendix C: Transport Forecasting Package [APP-301] section 5.5.15 shows the journey times forecast along whole A303 corridor with and without the scheme, indicating a net improvement as a result of the scheme.</p>
5.30	<p>The creation of a cul-de-sac byway open to all traffic (BOAT) (AMES11) is not desirable and does</p>	<p>TR010025 - 8.8 Statement of Common Ground – Wiltshire Council, Issue Ref 3.8.4, Doc Ref RR-2365, Page 48-50</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
	<p>not accord with Wiltshire Council's duties under s.130 Highways Act 1980. AMES11 retains its rural character within existing use but would be vulnerable to damage arising from the potential increase in traffic and the additional manoeuvres and conflicts between vehicular and non-vehicular traffic in wet weather.</p>	<p>And 8.10.16 Traffic and Transport (Tr.1) -Tr1.28 (iii) page 16-48</p> <p>The access to AMES11 for mechanically propelled vehicles (MPVs) would be from the south via Springbottom Farm. Under existing conditions, recent camera surveys on Byways 11 and 12 indicate that the majority of recorded MPVs frequently access AMES11 from A303 then park. They then turn on AMES11 and return to A303. As the southern end of AMES11 is less accessible than A303, such turning and use is unlikely to create additional manoeuvres and conflicts between vehicular and non- vehicular traffic compared with the existing situation.</p>
5.31	<p>Proposals do not show how traffic which uses AMES11, approaching from the south, would manage to turn around at the northern end of the cul-de-sac.</p>	<p>As detailed in section 3.5.13 of the Statement of Common Ground with Wiltshire Council submitted at Deadline 2 [REP2-018], where an existing highway is proposed to be stopped up, adequate turning facilities will be provided for road users.</p> <p>The parties agree that matters relating to the highways that Wiltshire Council would become liable to maintain, as a result of the Scheme, are capable of being resolved through the terms of a legal agreement between the parties. The parties intend to conclude such an agreement before the close of the examination.</p>
5.32	<p>A360 (between Salisbury and the A303 at Longbarrow junction) - The Scheme will lead to a potential increase at 2031 in traffic levels compared with the Do Minimum scenario, which could have adverse consequences most likely to be evident in Devizes Road Salisbury. Forecast flows in are relatively modest at circa 13300 vpd,</p>	<p>Noted.</p>

Ref	Wiltshire Council LIR Comment	Highways England Response
	and it is not considered that the impact of additional traffic warrants local intervention.	
5.33	<p>To Longbarrow Green Bridge - The effects of the changes from a narrower green bridge over the proposed A303 on the line of the existing A360 to a 150m wide green bridge sited between the A360 and the western tunnel portal will have the effect of increasing the route length of the north south route, owing to the diversion involved to reach the bridge. It is not considered that this is a material issue because the numbers of non-motorised traffic likely to use the route is relatively modest, and likely also to be leisure users who will not have journey time as their highest priority.</p>	Noted.

6 Ecology and Landscape

Table 6-1: Ecology and Landscape: Positive Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None identified	

Table 6-2: Ecology and Landscape: Positive Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
7.01	The creation of additional chalk grassland at Parsonage Down will support increased populations of a wide range of chalk flora, invertebrates and small mammals.	Noted.
7.02	Permanent beneficial landscape and visual effects due to improved tranquillity, habitat creation and a reduction in landscape severance within the WHS.	Noted.
7.03	Overall, the Scheme will result in increased connectivity of habitat across a wide area, through the inclusion of the green bridges, new chalk grassland creation and new hedgerow and tree planting.	Noted.
7.04	With suitable management prescriptions within the footprint of the Scheme and of adjacent HE soft estate, there is potential for a net gain for biodiversity.	Noted.

Table 6-3: Ecology and Landscape: Neutral Impacts

Ref	Wiltshire Council LIR Comment	Highways England Response
7.05	There will be no adverse impacts on the conservation objectives of any statutory designated sites within a calculated zone of influence as a result of the scheme (as demonstrated in the Appropriate Assessment).	Noted.
7.06	The most sensitive habitat areas and those that support or potentially support protected species have been identified and mitigated for through the development of the Scheme, such that there will be no change in ecological functionality of the landscape.	Noted.
7.07	There will be no additional adverse landscape and visual effects as a result of the proposed modifications to the Rollestone Crossroads layout.	Noted.

Table 6-4: Ecology and Landscape: Negative Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
7.08	Visual and experiential effects associated with construction including temporary compounds, fencing, hoardings, lighting etc. for visitors to WHS, local residents and PROWs.	We acknowledge that the visual impact assessment has identified adverse visual effects as a result of the construction phase to visitors to the WHS, local residents and users of Public Rights of Way due to the presence of temporary compounds, fencing, hoardings and general construction activity. These effects are summarised in table 7.11 of APP-045, along with reference to mitigation proposed.
7.09	The Nile Clumps - The trees are protected by a tree preservation order. It is estimated that a couple of	As detailed in paragraph 7.9.48 of the ES (APP-045) within the WHS, the Nile Clumps would remain, having been protected during the construction phase by the measures set out in the

	these clumps of trees may be affected by the proposals and therefore an assessment of these trees is needed.	OEMP. Protection of trees retained within the limits of the scheme will be set out in the Arboricultural Mitigation Strategy, as stated in the OEMP MW-LAN3. This will include the definition of root protection areas around the retained trees. Compliance with the OEMP [APP-187] is secured through paragraph 4 of Schedule 2 of the draft Development Consent Order and is the basis from which detailed, works-specific, CEMPs will be prepared by the relevant contractors.
7.10	Some disruption to habitats during the construction, which will need to be dealt with under CEMP specific to each location and to the habitats / species affected	Noted.

Table 6-5: Ecology and Landscape: Negative Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
7.11	Residual adverse visual effects will remain within the Till Valley due to the viaduct and for the users of the PROW network and the residents at Countess Farm.	<p>We acknowledge as set out in paragraph 7.9.111 of APP-045 that significant adverse effect would remain to receptor VR 07B (recreational users of Byway WST 04). This is due to the River Till Viaduct remaining a noticeable feature within close range views and that new planting would not screen the viaduct, due to retaining the open character of the valley floor.</p> <p>For Countess Farm, paragraph 7.9.112 of APP-045 sets out that significant adverse effect would remain to receptor VR 30A (Countess Farm). Whilst the planting will grow and provide partial screening, the upper part of the flyover retaining wall and the noise barrier, along with the upper parts of high sided vehicles would be noticeable above the planting, due to its elevated position.</p>

Table 6-6: Ecology and Landscape: Extant Opportunities

Ref	Wiltshire Council LIR Comment	Highways England Response
7.12	Preliminary Works – ensure sufficient good working practices and forward mitigation are in place for all preliminary works e.g. tree protection for TPOs and veteran field trees, habitat works and site clearance to be carried out sensitively.	<p>Noted.</p> <p>The OEMP [APP-187] sets out the appropriate actions and commitments with respect to the preliminary works in Table 3.2a. Each of the Preliminary Works contractors will be required to develop a detailed CEMP that covers the scope of their works. Specific method statements will be produced, where appropriate, to inform the specific proposed ecological mitigation works. Compliance with the OEMP [APP-187] is secured through paragraph 4 of Schedule 2 of the draft Development Consent Order [APP-020] and is the basis from which detailed, works-specific, CEMPs will be prepared by the relevant contractors.</p>
7.13	The Scheme could include a target to incorporate remedial management of the Protected Road Verge alongside Yarnbury Castle.	Remedial management of the Protected Road Verge alongside Yarnbury Castle was started in 2018 and does not form part of the Scheme.
7.14	The isolated ‘internal’ grass verges could provide a green refuge for invertebrates and sedentary slow worms. Recommend seeding with a suitable wild flower mix and implementing appropriate monitoring and management.	Noted.
7.15	Consideration could be given to any opportunity to underground the existing overhead electricity cables and removal of the pylons.	The existing power lines crossing the WHS are unaffected by the Scheme. Any changes to them are therefore a matter for the

Ref	Wiltshire Council LIR Comment	Highways England Response
		power distribution company and outside the terms of the planning of this project.
7.16	There is opportunity to create additional bat roosting features at key locations by the provision of structures or provision of access to existing structures.	<p>Noted.</p> <p>Bat roosting/ hibernation structures have been included within the design of the Scheme indicatively illustrated within [APP-059]. The underpass near Vespasian's Camp will be converted into a bat roost / hibernation feature, suitable for a variety of bat species. Furthermore, a bat roosting / hibernation structure will be constructed west of the Till valley. The requirement for the provision of further bat roosting mitigation will be informed by the updated bat surveys to be undertaken prior to vegetation clearance (PW-BIO7) [APP-187] and the requirement contained in paragraph 6 of Schedule 2 to the draft Development Consent Order.</p>

7 Public Rights of Way (PROW)

Table 7-1: Public Rights of Way (PROW): Positive Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None identified	

Table 7-2: Public Rights of Way (PROW): Positive Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
6.01	Sheets 1,2 & 3 (of 15) - The creation of new rights of way to the south and north of the A303 as restricted byways will assist and enhance recreational access in this area and will undoubtedly reduce the number of crossings of the A303 for users of SLAN3. The designation of restricted byway offers the least restrictive access to the widest range of users and accords with the requirements of the Equality Act 2010.	Noted.
6.02	Sheet 2 (of 15) - The creation of the byway open to all traffic link for BSJA3 to the new byway open to all traffic leading into Winterbourne Stoke should regularises existing usage.	Noted.
6.03	Sheets 5,6,7,8, 14 & 15 - The creation of a wider restricted byway network will offer greater opportunities for access to the WHS and wider area for all non-motorised users.	Noted.

6.04	Sheets 7 & 8 (of 15) - PROW No. AMES 10, where it meets old A303 – Proposal to retain private vehicle access to Custodian Cottages will make link to former A303 route.	Noted.
6.05	Sheet 11 (of 15) - The creation of a restricted byway link throughout the site linking to Amesbury will utilise maximum access opportunities.	Noted.
6.06	Sheet 11 (of 15) - Alterations to access in the Allington Track area for reasons of safety.	Noted.

Table 7-3: Public Rights of Way (PROW): Neutral Impacts

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None identified	

Table 7-4: Public Rights of Way (PROW): Negative Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
6.07	Temporary (and in some cases lengthy) disturbances and disruptions are anticipated during the construction phase to use of the public rights of way which are to be diverted or stopped-up, or connect into other roads that will be undergoing changes. Details are yet to be provided of any adverse effects upon their availability and usability during this time, and of the extent to which connectivity between public rights of way will be disrupted.	As detailed in section 3.8.3 of the Statement of Common Ground with Wiltshire Council submitted at Deadline 2 [REP2-018], Wiltshire Council will be consulted on the contents of a Traffic Management Plan pursuant to paragraph 9 of Schedule 2 to the draft DCO [REP2-003]. Matters to be included in this plan are set out in reference MW-TRA2 of the Outline Environmental Management Plan [APP-147], compliance which is secured by paragraph 4 of Schedule 2 to the draft DCO.

		Further measures are also set out in items TRA3-TRA11 of the OEMP, which include specific protections for PRowWs.
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Table 7-5: Public Rights of Way (PROW): Negative Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
6.08	Sheets 1,2 & 3 (of 15) – The lack of a link between SLAN3 and BSJA3 as a byway open to all traffic will result in motorised vehicles still needing to cross the A303 at this point.	Motorised access from BSJA3 to the new A303 will be via the old A303 through Winterbourne Stoke and the new Longbarrow junction. The proposed restricted byway between BSJA3 and SLAN3 is not being created as a BOAT because that would also allow vehicles from Winterbourne Stoke and Berwick St James to use the route to access the A303 westbound via a sub-standard access point. This would lead to increased turning movements where SLAN3 joins the A303 and hazardous conflicts between slow and fast-moving traffic.
6.09	Sheet 5 (of 15) - Proposal to Widen Green Bridge Near Longbarrow Roundabout - The chosen position of the green bridge requires a non-straight line route to be created. Wear and tear of the surface, including the pooling of surface water, is likely to occur at the corners. It may be possible to overcome these issues through appropriate surfacing and design.	In accordance with article 9 of the draft DCO [REP2-003] Wiltshire Council would become the local highway authority for the new, altered or diverted part of the highway, which must be completed to Wiltshire Council's reasonable satisfaction. Discussions are underway between Highways England and Wiltshire Council on matters relating to highways which would be maintained by Wiltshire Council. It is noted that such discussions will need to include matters such as proposals for surfacing, width, signage and boundary treatments. The outcome of those discussions will be subject to agreement between the two parties and will be submitted to the Examination in due course.

<p>6.10</p>	<p>Sheet 7 (of 15) - The creation of a cul-de-sac byway open to all traffic (AMES11) is not desirable. AMES11 retains its rural character within existing use but would be vulnerable to damage arising from the doubling of use and the additional manoeuvres and conflicts between vehicular and non- vehicular traffic in wet weather.</p>	<p>As detailed in paragraph 11 of the Applicant’s response to the Examining Authority’s Written Question Tr.1.28 (REP2-036). The existing A303 currently acts as a link for motorised vehicles between the</p> <p>byways open to all traffic AMES11 and AMES12. The Scheme proposes the</p> <p>removal of approximately 5.91 kilometres of the existing A303 (shown on sheets 4 to 8 inclusive of the Rights of Way and Access Plans [APP-009]) to be replaced by the new and improved A303, shown on sheets 2 to 9 inclusive and sheet 11 of the Rights of Way and Access Plans. AMES 11 and AMES 12 will remain byways open to all traffic (including motorised vehicles). However, along the line of what will be the former A303, from the existing Longbarrow roundabout (sheet 5 of the Rights of Way and Access Plans [APP-009]) to part way along the existing Stonehenge Road, the Scheme proposes a new restricted byway (references IB, I and J shown on sheets 5 to 8 inclusive of the Rights of Way and Access Plans [APP-009]). Not providing public vehicular rights along the new restricted byway is consistent with the Scheme's aim of removing the sight and sound of traffic from the vicinity of Stonehenge and the historic landscape of the World Heritage Site.</p> <p>The assertion that byway AMES11 would experience a doubling of use is not evidenced. The access to AMES11 for mechanically propelled vehicles (MPVs) would be from the south via Springbottom Farm. Under existing conditions, recent camera surveys on Byways 11 and 12 indicate that the majority of recorded MPVs frequently access AMES11 from the A303</p>
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		then park. They then turn on AMES11 and return to A303. As the southern end of AMES11 is less accessible than A303, such turning and use is unlikely to create additional manoeuvres and conflicts between vehicular and non- vehicular traffic compared with the existing situation.
6.11	AMES11 and 12 - There is risk of an increase in motorised traffic, in particular due to the loss of the view of Stonehenge available to motorists using the A303.	The assertion that byways AMES11 and AMES12 would experience an increase in motorised traffic is not evidenced. AMES12 is accessible from Larkhill by a standard car. However, access from the south either along Byway 11 via Springbottom Farm or along Byway 12 from Druid's Lodge would be extremely challenging for, and unlikely to be attempted by, vehicles without off-road capability.
6.12	Sheet 11 (of 15) PROW AMES 2, where it meets A303 north of A303 – Proposal to be stopped up and connection to A303 closed. There is no alternative provision north and no connection south of A303.	AMES2 and BULF12 are being closed to improve safety along the A303. This is needed because the current arrangement places slow and fast-moving vehicles in potentially dangerous conflict with each other. Alternative connectivity with the A303 in this vicinity will remain available at Amesbury Road (north) and the A3028. An alternative reasonably convenient safe crossing point on the A303 trunk road would be available a short distance to the west, via the Solstice Park junction.

Table 7-6: Public Rights of Way (PROW): Extant Opportunities

Ref	Wiltshire Council LIR Comment	Highways England Response
6.13	Sheets 5 & 15 (of 15) - To improve connectivity for the maximum possible range of non-motorised	8.10.2 - Ag.1.4, (i), para. 20 Page 13

Ref	Wiltshire Council LIR Comment	Highways England Response
	<p>users, it would be advantageous to make the proposed link from BSJA9 south to WFOR16 a restricted byway instead of a bridleway as this would give greater access opportunities. Without it, there would be a need to utilise the road network, which for slow, horse drawn vehicles, presents a significant risk. It is, however, recognised that there are physical constraints which may restrict the options otherwise available.</p>	<p>Bridleway Reference V (Sheet 15 of the Rights of Way and Access Plans)</p> <p>Bridleway reference V extends the connection from the existing Longbarrow junction in the north (via Route 1A 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 for 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. Extending the restricted byway south of BSJA9 would require the removal of some mature trees alongside the A360, whereas a bridleway can be safely accommodated within the width available at the location put forward in the Applicant's proposals.</p>
6.14	<p>Sheet 9 (of 15) PROW AMES 44, where it crosses A303 over bridge is not mentioned. Bridge retained to maintain access.</p>	<p>The bridge that carries AMES 44 over the A303 is not affected by the Scheme and will therefore be retained with no impact on AMES44.</p>

8 Built Heritage

Table 8-1: Built Heritage: Positive Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
8.01	None identified	<p>Environmental Statement Appendix 6.9, Setting Assessment divides the assessment (at paragraph 2.2.1 into two parts:</p> <p>A) Construction phase impacts including:</p> <ul style="list-style-type: none"> i. effects arising from the Scheme as built; comprising the presence of the new road and its associated infrastructure, together with any relevant physical effects such as landscape severance or reconnection; and ii. effects arising from the decommissioning of the present A303, in terms of visual changes and landscape reconnection. <p>b) Operational phase:</p> <ul style="list-style-type: none"> i. effects arising from traffic using the Scheme; and ii. effects arising from the removal of traffic from decommissioned sections of the present A303. <p>The following Slight beneficial impacts on built heritage assets were identified for the construction phase of the Scheme:</p> <p>6033 - Stonehenge Aerodrome boundary marker AM1 (non-designated);</p> <p>6037 - Stonehenge Aerodrome boundary marker AM12 (non-designated);</p> <p>6038 - Stonehenge Aerodrome boundary marker AM11(non-designated);</p> <p>6039 – Milestone opposite Stonehenge (grade II);</p>

		6040 – Milestone (grade II); 6041 – Custodians’ Cottages at King Barrow Ridge (non-designated); and 6042 – Milestone near junction with A303(T) (grade II).
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Table 8-2: Built Heritage: Positive Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
8.02	Winterbourne Stoke Conservation Area (CA), Manor House (II*) - The removal of the busy road from the northern edge of the settlement (bar a very small number of roadside dwellings on the north side of the road) would be positive in that it would be a quieter and safer place.	Noted, although it should be recognised that for cultural heritage these are construction rather than operational effects.
8.02	Stonehenge Cottages (Undesignated, of Modest Heritage Interest) - The setting of the cottages would be significantly changed by the proposals; however, this seems to be entirely positive with the removal of the busy road from its surroundings, making it much quieter and safer.	Noted, although it should be recognised that for cultural heritage these are construction rather than operational effects.

Table 8-3: Built Heritage: Neutral Impacts

Ref	Wiltshire Council LIR Comment	Highways England Response
8.03	Milestone, 850m East of Longbarrow Roundabout (II) – The milestone itself would be unaffected however it	Noted, although it should be recognised that for cultural heritage these are construction rather than operational effects.

Ref	Wiltshire Council LIR Comment	Highways England Response
	<p>would now be alongside a byway rather than a major route; the former relationship with the major road should be sufficiently apparent to viewers that the legibility and significance of the heritage asset would be maintained. The improved ability to stop and look at it safely is a modest benefit.</p>	
8.04	<p>Milestone, Stonehenge Road, West Amesbury (II) - The milestone itself would be unaffected however it would be less visible to the public as the road would now be a dead-end for vehicles, although pedestrian access would continue. This asset has previously been affected, when the A303's construction reduced it to a slip road, and the impact is considered to be negligible.</p>	<p>Noted, although it should be recognised that for cultural heritage these are construction rather than operational effects.</p>
8.05	<p>There appears to be no negative impact on the setting of the Amesbury Abbey (Grade I) and the Park (II*).</p>	<p>Environmental Statement Appendix 6.9, Setting Assessment assessed no impact on Amesbury Abbey as a result of either the construction or operational phases of the Scheme. The assessment identified the impact of the construction and operational phases of the scheme on the Amesbury Abbey RPG as Slight adverse.</p>

Table 8-4: Built Heritage: Negative Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
8.06	None identified	<p>Environmental Statement Appendix 6.9, Setting Assessment identified Slight adverse impacts on the following built heritage assets as a result of the construction phase of the Scheme:</p> <p>6013 – Foredown House (non-designated); 6052 - Amesbury Conservation Area; 6053 - Amesbury Abbey (grade II* registered park and garden); 6061 - Grey Bridge (grade II); 6062 - Diana’s House (grade II*); 6063 - Estate Boundary Wall (grade II); 6064 - Gate Piers to Lord's Walk, to Amesbury Abbey, with flanking Estate Boundary Walls grade II*; 6065 - Kent House (grade II*); 6067 - Countess Farmhouse and front garden walls (grade II); 6069 - Large Granary at Countess Farm (grade II); 6070 - Large Barn at Countess Farm (grade II); 6113 - Millmead (grade II);</p> <p>In addition, Environmental Statement Appendix 6.9, Setting Assessment identified a Moderate adverse impact on the following</p>

		<p>built heritage assets as a result of the construction phase of the Scheme:</p> <p>6068 - Stables and Barn at Countess Farm (grade II)</p>
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Table 8-5: Built Heritage: Negative Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
8.07	<p>Winterbourne Stoke CA, Manor House (II*) - The new Till Valley crossing would have an increased impact on the setting and outlook of the cottages at Foredown House and the barn at Foredown Barn (960m NNE of the cottages), but these are both undesignated and only of local interest, with the level of harm to their heritage significance being at the lower end of 'less than substantial'.</p>	<p>The presence of the River Till Viaduct is assessed in Environmental Statement Appendix 6.9, Setting Assessment as a construction phase effect as opposed to an operational phase effect. Both construction and operational phase effects are neutral on 6012 Foredown Barn (non-designated) and Slight adverse on 6013 - Foredown House (non-designated).</p>
8.08	<p>Winterbourne Stoke CA, Manor House (II*) - View to the north of the CA, up the Till Valley, will be significantly altered with the introduction of the viaduct and the associated landscaping.</p>	<p>Noted. However, it should be recognised that for cultural heritage the presence of the River Till Viaduct is a construction phase impact arising from the Scheme as built. Only a small proportion of the conservation area will be affected, the Manor House will be screened from the viaduct and will not be affected.</p>
8.09	<p>Winterbourne Stoke CA, Manor House (II*) - The disconnection of the village from the through- traffic is perhaps a minor negative impact, in that it becomes a quiet rural village with few reasons to visit.</p>	<p>The Environmental Statement Appendix 6.9, Setting Assessment assesses the impact on the conservation area and Manor House to be Slight beneficial as it will remove through traffic from the village, lowering traffic noise and removing the visual effect.</p>

8.10	The setting of the Amesbury Abbey Lodges (Kent and Diana's House, both II*) and Listed Bridge on Countess Road would be affected to a modest degree by the flyover, this impact, while greater than the existing roundabout layout, would still be at the lower end of the scale as that area of its landscape setting is already so altered.	Noted. However, it should be recognised that for cultural heritage the presence of the flyover is a construction rather than an operational effect.
8.11	Countess Farm (Farmhouse, Two Granaries, Two Barns and Stables, All Grade II) - This site is most affected by the Scheme, lying immediately adjacent to the highways of both A303 and Countess Road. The flyover would be elevated along its southern boundary, thus introducing views of high level traffic and increased noise to the site.	Noted. However, it should be recognised that for cultural heritage the presence of the flyover is a construction effect, the presence of traffic on the flyover is an operational effect.
8.12	Ratfyn Farm (Grade II) – Streetlighting of this area would have a degree of urbanising effect on the setting of the Listed Building.	Measures to conserve or enhance the permanent setting of heritage assets have been embedded in the Scheme. Chapter 6, Cultural Heritage of the Environmental Statement notes (at paragraph 6.8.5 e) that: 'Lighting is designed for minimal impact, utilizing downlights with lower light spill to reduce impacts on the surrounding landscape and 'dark skies'. Longbarrow Junction, Countess Flyover and Rolleston Corner would not be lit; tunnel portal lighting would be downlit and hooded to avoid light spill; lighting changes at Countess Roundabout would reduce light-spill.'

Table 8-6: Built Heritage: Extant Opportunities

Ref	Wiltshire Council LIR Comment	Highways England Response
10.14	Planting of the eastern embankment would help hide the proposed viaduct and visual impact of associated landscaping on the view to the north of the Winterbourne Stoke Conservation Area, up the Till Valley.	<p>For landscape and visual matters, the operational phase of the scheme is its finished and usable state. Table 7.5: LVIA operation mitigation in Chapter 7: Landscape and visual of the Environmental Statement lists mitigation embedded in the scheme including:</p> <p>‘Sympathetic regrading of the earthworks between the River Till viaduct and Longbarrow Junction along the north and south of the new A303, including 2m false cuttings, new native hedgerows to tie in with retained vegetation, return of land to agricultural use and new green bridge (Green Bridge Two).’</p>

9 Public Health and Public Protection

Table 9-1: Public Health and Public Protection: Positive Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None identified	

Table 9-2: Public Health and Public Protection: Positive Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
9.01	Positive impact of reduced noise for existing road side properties in Winterbourne Stoke when existing A303 route is de-trunked.	Noted.
9.02	Positive impact of reduced road noise at Stonehenge Cottages due to A303 being re-routed below ground.	Noted.
9.03	Positive impact of reduced road surface noise affecting the local amenity along the new A303 route.	Noted.
9.04	Improvements in air quality in existing road side properties in Winterbourne Stoke when existing A303 route is de-trunked.	Noted.
9.05	Improvements in air quality at Stonehenge Cottages due to A303 being re-routed below ground.	Noted.
9.06	Improvements in air quality at Countess Farm due to reduction in congestion and stop start traffic conditions at existing roundabout.	Noted.

9.07	Improvements in air quality in adjacent routes as rat running should reduce with free flowing A303 design including wider potential impacts on existing Air Quality Management Areas (AQMAs) in Salisbury.	Noted.
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Table 9-3: Public Health and Public Protection: Neutral Impacts

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None Identified	

Table 9-4: Public Health and Public Protection: Negative Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
9.08	Noise and Vibration - Impact in Winterbourne Stoke from bypass and viaduct construction and associated haulage routes and work compounds (including hours of work, vibration (piling operations), positioning of work compounds and plant and vehicle storage).	<p>Chapter 9 of the Environmental Statement (ES) [APP-047] details the assessment of potential noise and vibration effects during construction. It concludes there is a risk of significant construction noise effect at the closest receptor to the works at Winterbourne Stoke, namely Foredown House.</p> <p>Construction noise and vibration mitigation measures are contained in the Outline Environmental Management Plan (OEMP) [APP-187], compliance with which is secured by Paragraph 4 of Schedule 2 of the dDCO [APP-020]. Working hours are controlled in the OEMP by MW-G12 to G16, any works outside of the core hours will be agreed with Wiltshire Council prior to undertaking the works under Section 61 of the Control of Pollution Act 1974. MW-NOI1 requires the contractor</p>

		<p>to adopt Best Practicable Means (BPM) to control noise and vibration. As set out</p> <p>in the OEMP [APP-187] a Noise and Vibration Management Plan will be prepared by the contractor appointed to construct the scheme (MW-NOI3) which will contain further details on noise and vibration mitigation and monitoring measures.</p>
<p>9.09</p>	<p>Noise and Vibration - Impact of construction of flyover at Countess roundabout for Countess Farm and adjacent properties (including hours of work, vibration (piling operations), positioning of work compounds and plant and vehicle storage).</p>	<p>Chapter 9 of the Environmental Statement (ES) [APP-047] details the assessment of potential noise and vibration effects during construction. It concludes there is a risk of significant construction noise effect at the closest receptors to the works at Countess, represented by C8, C9, and C10. This is detailed in paragraph 9.9.8 of the ES. The receptors are listed in Table 9.14 and shown in Figure 9.1 [APP-164].</p> <p>Construction noise and vibration mitigation measures are contained in the Outline Environmental Management Plan (OEMP) [APP-187], compliance with which is secured by Paragraph 4 of Schedule 2 of the dDCO [APP-020]. Working hours</p> <p>are controlled in the OEMP by MW-G12 to G16, any works outside of the core hours will be agreed with Wiltshire Council prior to undertaking the works under Section 61 of the Control of Pollution Act 1974. MW-NOI1 requires the contractor to adopt Best Practicable Means (BPM) to control noise and vibration. As set out</p> <p>in the OEMP [APP-187] a Noise and Vibration Management Plan will be</p>

		prepared by the contractor appointed to construct the scheme (MW-NOI3) which will contain further details on noise and vibration mitigation and monitoring measures.
9.10	Noise and Vibration - Impact of vibration from tunnelling work at Stonehenge Cottages (including hours of work, vibration (tunnelling operations), positioning of work compounds and plant and vehicle storage).	The potential effect of vibration from tunnelling at Stonehenge Cottages is reported in Chapter 9 of the (ES) [APP-047]. The risk of exceeding the Significant Observed Adverse Effect Level (SOAEL) for construction vibration annoyance is estimated to occur when the tunnel boring machine (TBM) is within a distance of approximately 55m of Stonehenge Cottages. This is detailed in paragraph 9.9.20 of Chapter 9 of the ES. A commitment to the offer of temporary rehousing to residents at Stonehenge Cottages if the monitoring of vibration levels at the Cottages on the approach of the TBM indicates that PPV levels exceeding 1mm/s are likely to occur continuously for a period of 48hrs or more during each tunnel bore has been added to the updated Outline Environmental Management Plan (OEMP) submitted at Deadline 3. This commitment is agreed under 3.3.12 of the Statement of Common Ground (SoGC) with Wiltshire Council submitted at Deadline 2. The vibration monitoring requirements are set out in MW-NOI6. Compliance with the OEMP [APP-187] is secured by Paragraph 4 of Schedule 2 of the draft Development Consent Order (dDCO).
9.11	Air Quality - Impact of dust generation from highways construction, associated haulage routes, soil stripping, spoil disposal, creations of cuttings and bunds and from work compounds with the potential impact of vehicles carrying tunnel arising if these materials cannot be reused at the proposed development site both from vehicle exhaust	Construction dust mitigation measures will be employed during construction to manage dust emissions. Mitigation by standard good practice mitigation measures have been included in the Outline Environmental Management Plan (OEMP) [APP-187] submitted with the draft Development Consent Order (dDCO) [APP-020], which is secured through Paragraph 4 of Schedule 2 to the dDCO. Measures include management of dust in accordance with best practicable means, including the

	<p>emissions and potential impacts associated with the transportation of dusty materials.</p>	<p>measures listed in the Institute of Air Quality Management’s (IAQM) Guidance on the Assessment of Dust from Demolition and Construction (OEMP, MW-AIR1).</p> <p>Off-site disposal is not proposed as part of the Scheme. Furthermore, on site disposal is secured pursuant to paragraph 8 of Schedule 2 to the draft DCO [APP-020], which requires approval of the landscaping for the Scheme, of which the spreading of on-site excavated material east of Parsonage Down forms a part.</p>
<p>9.12</p>	<p>Air Quality - Impact of dust generation during construction of flyover at Countess roundabout for Countess Farm and other properties adjacent to the roundabout.</p>	<p>The construction works are considered to have a risk of dust egress and this can be adequately controlled using standard mitigation measures, as described in the Outline Environmental Management Plan (OEMP) [APP-187] specifically in MW-AIR1. There are some locations where further standard mitigation is proposed. These are locations where notable sources of dust generation are anticipated (e.g. haul routes, large earthworks and stockpiling etc) and where sensitive receptors (i.e. residential locations) are in close proximity, some within 10 meters(m). This includes activities at Countess Roundabout such as the construction of the flyover. When further standard good practice measures are implemented the level of mitigation is increased (e.g. additional dust suppression techniques) and the level of monitoring is also increased (e.g. continuous ambient air quality monitoring). This approach reflects the higher risks associated with construction works in some areas and the additional sensitivity of the surroundings within which some works are being undertaken. The need for further standard good practice dust mitigation measures in some locations has been included in the OEMP [APP-187] specifically in MW-AIR2.</p>

9.13	Light Nuisance - Impact of artificial lighting (for working and security) during the construction phase.	<p>CEMP(s) will be prepared for each phase of the main works, in consultation with Wiltshire Council, prior to the commencement of that phase.</p> <p>This will include information as to lighting, which must be in accordance with the provisions of item MW-G29 of the OEMP, which set out that lighting should also be designed, positioned and directed so as not to unnecessarily intrude on adjacent buildings, ecological receptors, structures used by protected species and other land uses to prevent unnecessary disturbance, interference with local residents, or passing motorists. Compliance with the OEMP will be secured through Requirement 4 of Schedule 2 to the draft DCO.</p>
9.14	Light Nuisance - Impact of lighting associated with the Countess roundabout flyover	<p>The Countess roundabout flyover is not proposed to be lit. The existing lighting will be replaced and therefore there will be a potential beneficial change from more efficient lighting and reduced light spillage (see item D-CH12 of the OEMP). The temporary lighting during construction has been considered within the LVIA, as per the above comment (3.19.6).</p> <p>Measures to control and reduce the impacts of artificial lighting have been included in the OEMP [APP-187], at references D-CH9, D-CH10, D-CH11, as well as item D-CH12 mentioned above, compliance with which is secured by requirement 4 of Schedule 2 to the draft DCO [APP-020].</p>
9.15	Private Water supplies - Impact of accidental contamination of ground water sources affecting local private water supplies.	<p>In the case of the main works, item MW-WAT4 of the OEMP requires the main works contractor to include spill response procedures in its Emergency Preparedness and Response plan required by item MW-G20. This refers to the need for reporting to relevant parties and would include all water receptors such as groundwater and private water supplies.</p>

Table 9-5: Public Health and Public Protection: Negative Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
9.16	Increased noise at Manor farm and Foredown House in Winterbourne Stoke.	<p>The Noise and Vibration Chapter of the Environmental Statement (ES) [APP-047] identifies a significant adverse effect in terms of operational traffic noise levels at the residential property Foredown House on the northern edge of the village. Manor Farm to the north of the A303 consists of a range of barns only, therefore an adverse effect has not been identified in the ES at this location. The associated farmhouse is to the south of the A303 and therefore is predicted to experience a reduction in traffic noise levels.</p> <p>A range of mitigation measures have been incorporated into the design as outlined in section 9.8 of Chapter 9 of the ES [APP-047]. Of relevance to Foredown House are the use of false cuttings on the bypass north of Winterbourne Stoke, use of a thin surfacing system which results in lower levels of noise generation than a standard hot rolled asphalt surface at speeds at and above 75km/hr; and</p> <p>inclusion of a 1.5m high solid parapet on the south side of the River Till viaduct. The last two of these measures are secured by the Outline Environmental Management Plan (OEMP), compliance with which is secured by the requirement contained in paragraph 4 of Schedule 2 to the draft Development Consent Order.</p>
9.17	Increased noise from elevated section at Countess roundabout adjacent to Countess Farm but planned barrier mitigation will assist.	The Noise and Vibration Chapter of the Environmental Statement (ES) [APP-047] identifies negligible and minor (not

		<p>significant) changes in operational traffic noise levels at receptors in the vicinity of Countess flyover.</p> <p>The adverse effects of the operation of the Countess flyover have been mitigated through the incorporation of mitigation measures into the design, primarily the use of a thin surfacing system which results in lower levels of noise generation than a standard hot rolled asphalt surface at speeds at and above 75km/hr and inclusion of 1.8m high absorptive noise barriers on both the north and south side of Countess flyover. These measures would be secured through the Outline Environmental Management Plan, compliance with which is secured by the requirement contained in paragraph 4 of Schedule 2 to the draft Development Consent Order.</p>
9.18	The property Lindisfarne in Ratfyn Road is identified as potentially exceeding the noise insulation regulations assessment.	Noted. All new/alterd highways fall under the remit of the Noise Insulation Regulations 1975. The regulations lay down a required procedure, which includes an obligation to carry out the assessment within 6 months of opening, the purpose of which is to identify qualifying properties. Qualifying properties would be notified in accordance with the Regulations.
9.19	Noise and Vibration - Operational long-term impact from traffic noise particularly on elevated sections where any potential future development may introduce new dwellings adjacent to the new route.	Chapter 15 Assessment of Cumulative Effects of the Environmental Statement [APP-053] considered a number of other developments in the area, see Appendix 15.2 [APP-291] and Figure 15.2 [APP-183]. The Cumulative Effects assessment did not identify any proposed residential developments in close proximity to the Scheme.
9.20	Light Nuisance - Impact of lighting associated with the Countess Roundabout flyover and signage.	The Countess roundabout flyover is not proposed to be lit. The existing lighting will be replaced and therefore there is a potential beneficial change from more efficient lighting and

		<p>reduced light spillage (see item D-CH12 of the OEMP). The temporary lighting during construction has been considered within the LVIA, as per the above comment (3.19.6). Measures to control and reduce the impacts of artificial lighting have been included in the OEMP [APP-187], at references D-CH9, D-CH10, D-CH11, as well as item D-CH12 mentioned above, compliance with which is secured by requirement 4 of Schedule 2 to the draft DCO [APP-020].</p> <p>As stated within section 6.2 of the Design and Access Statement [APP-295], Paragraph 6.2.8, the detail of traffic signage to be included within the Scheme will be determined during the detailed design process, which is the next stage in the Scheme's development.</p> <p>However, the Scheme has committed to no signage or other vertical installations (such as CCTV) above the top of the cutting and no lighting of signs at the western end of the Scheme in order to protect the WHS's OUV (see OEMP, D-CH8). To minimize the visibility of new infrastructure within the WHS signage and other highways installations will sit completely within the approach cuttings and not extend above them. Appropriate signage and infrastructure would be provided outside the WHS to manage traffic through the corridor.</p>
9.21	Private Water supplies – Potential impact of accidental contamination of ground water sources affecting local private water supplies from road traffic accidents.	For water quality, the assessments of effects included spillages and routine road runoff on both surface water quality and groundwater quality. For water quality in the River Avon there is a Moderately Beneficial residual effect as a result of improved prevention and treatment of pollution from road runoff and

		sediment transport. Paragraph 11.9.4 of Chapter 11: Road Drainage and the Water Environment [APP-049]
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10 Flood Risk and Drainage

Table 10-1: Flood Risk and Drainage: Positive Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None identified	

Table 10-2: Flood Risk and Drainage: Positive Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
10.01	The proposed highway drainage system will provide treatment for highway runoff in the form of filter drains and soakaways, thereby providing water quality benefits. Currently the highway drainage system discharges to unlined ditches.	Noted.

Table 10-3: Flood Risk and Drainage: Neutral Impacts

Ref	Wiltshire Council LIR Comment	Highways England Response
10.02	The draft DCO includes provisions for the disapplication of certain sections of the Land Drainage Act 1991, and by implication, the Wiltshire Council Land Drainage Byelaws 2014. We are currently	Highways England will continue to discuss the relevant protective provisions with Wiltshire Council.

Ref	Wiltshire Council LIR Comment	Highways England Response
	considering our position in relation to the protective provisions included in the draft DCO.	

Table 10-4: Flood Risk and Drainage: Negative Impacts - Construction Phase

Ref	Wiltshire Council LIR Comment	Highways England Response
N/A	None identified from information available to date	

Table 10-5: Flood Risk and Drainage: Negative Impacts - Operational

Ref	Wiltshire Council LIR Comment	Highways England Response
10.03	Surface water (pluvial) including ordinary watercourses – There is insufficient detail at this stage to accurately determine what the surface water impacts would be. Discussions are ongoing with HE to address the outstanding peer review actions and better understand the detailed plans for the Scheme.	The updated pluvial hydraulic modelling report is to be submitted to the Examination at Deadline 3 as an annex to the updated Flood Risk Assessment and demonstrates that the peer review comments have been addressed.
10.04	Groundwater – There is insufficient detail at this stage to accurately determine what the groundwater impacts would be. Discussions are ongoing with HE to address the outstanding peer review actions and better understand the detailed plans for the Scheme.	<p>In its written responses Wiltshire Council confirms that the additional data collection and interpretation has improved the understanding of the hydrogeology of the area and highlighted the heterogeneity in the aquifer system [REP2-045].</p> <p>The additional modelling runs and presentation of calibration data have provided reassurance and validity of the approach to the qualitative risk assessment. Ongoing discussion and agreement on any matters which are still under discussion or not agreed will be captured through the updated Statement of</p>

		Common Ground being prepared between the two parties, which will be made available to the Examination in due course.
10.05	Road drainage strategy – There is insufficient detail at this stage to accurately determine what the road drainage impacts would be. Discussions are ongoing with HE to address the outstanding peer review actions and better understand the detailed plans for the Scheme.	<p>It has been agreed between Wiltshire Council and Highways England that the level of detail is appropriate. Agreement on this matter has been captured in the Statement of Common Ground submitted to the Examination at Deadline 2 Issue 3.28.1 [REP2-018].</p> <p>Highways England continue to discuss the relevant peer review actions with Wiltshire Council.</p>
10.06	HE are specifying a lower climate change allowance for the road drainage than would normally be acceptable to the Council. This could result in flooding due to inadequate capacity within the infrastructure.	<p>This matter has been discussed with Wiltshire Council and will be clarified through the updated FRA, which will be submitted to the Examination at Deadline 3.</p> <p>There is no guidance specifying the way that climate change should be considered in the groundwater flood risk assessment. Unlike for fluvial and surface water flood risk where a rainfall event can be specified, for groundwater modelling the proportion of any rainfall event that becomes recharge to the aquifer will vary with the antecedent conditions and the intensity of the rainfall event. An intense rainfall event may lead to significant runoff and little recharge, while a summer storm may not generate recharge if there is a significant soil moisture deficit. In winter rainfall will become recharge when the soil zone has become saturated. The fluvial and surface water flood modelling [APP-284] considered an increase in rainfall using the summer as a critical storm duration. The groundwater modelling [APP-282] has assumed that this increase in rainfall in winter may generate a 20% increase in recharge when considering winter groundwater flood risk. This was considered to be a</p>

		<p>reasonable estimate for groundwater flood risk considering the expected variability after any rainfall event.</p> <p>Highways Drainage and Flood Risk are held to different national guidance standards for the representation of climate change. As such, both disciplines apply national best practice. Discussion on this matter is captured in the Statement of Common Ground being prepared between Wiltshire Council and Highways England, which will be submitted during the Examination.</p>
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Table 10-6: Flood Risk and Drainage: Extant Opportunities

Ref	Wiltshire Council LIR Comment	Highways England Response
10.07	HE could provide a consultant resource for data input of the historic information gained during the planning process onto an approved flood mapping system.	The presentation of historic information is clearly documented within the supporting information. At this stage it is not proposed that Highways England provides a specific consultant resource to update this information onto an approved flood mapping system as this is an area which is largely regulated and updated by the Environment Agency. However, Highways England is happy to give consent for its data prepared in support of the application to be used by the Environment Agency to add to and improve its data resource and mapping.

11 Social and Community Issues

Table 11-1: Social and Community Issues: Positive Impacts - Construction Phase

Ref	Positive Impacts- Construction Phase	Highways England Response
N/A	None identified	

Table 11-2: Social and Community Issues: Positive Impacts - Operational

Ref	Positive Impacts- Operational	Highways England Response
11.01	Reuniting WHS landscapes and reducing severance thereby improving connectivity for walkers, runners, cyclists and horse riders.	Noted.
11.02	Permanent improvement in access to local employment and training opportunities through improved journey time reliability leading to improved health and wellbeing.	Noted.
11.03	Permanent reduction of community severance in Winterbourne Stoke improving social cohesion.	Noted.
11.04	Improved access to and within the WHS to enhance learning and interpretation.	The People and Communities assessment (Chapter 13 of the ES [APP-051]) concludes that access to and within the WHS will be improved during operation. Although it is hoped that this improved access would aid learning and interpretation, this is an inference that has not been stated in the assessment. However, in proposing to communicate

		<p>the results of archaeological investigation and recording to a wide audience, the Public Archaeology and Community Engagement Strategy (Appendix F of the DAMS [REP2-038]) comprises several objectives around enhancing learning and interpretation from improved access to and within the WHS, including:</p> <ul style="list-style-type: none"> • Promoting accessible learning, through actively involving people in archaeology • Enhancing knowledge about archaeology along the proposed scheme corridor • Improving public understanding of developer-led archaeology
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Table 11-3: Social and Community Issues: Neutral Impacts

Ref	Neutral Impacts	Highways England Response
N/A	None identified.	

Table 11-4: Social and Community Issues: Negative Impacts - Construction Phase

Ref	Negative Impacts- Construction Phase	Highways England Response
11.05	<p>The principal potential impacts on agricultural land and farm-based enterprises are anticipated to occur during the construction of the Scheme. These potential impacts include the agricultural land required temporarily and permanently for the Scheme.</p>	<p>Impacts on farm holdings primarily arise from the loss of land for production and/or severance (and difficulty in accessing land), and/or construction nuisance. Once built farms are used to operating within and around roads and the new road will not impede access to holdings.</p> <p>Following construction of the scheme land required for a temporary period will be restored to agriculture in line with the provisions of the DCO and the OEMP.</p> <p>Further details are provided in the response to written question SE.1.27 [REP2-035].</p>
11.06	<p>Deposition of dust on sensitive crops, land uses and livestock.</p>	<p>Noted.</p> <p>There are no sensitive crops, land uses or livestock adjacent to the construction sites. Sensitive crops include foodstuffs for (direct) human consumption and sensitive livestock would be particularly young, housed animals. The standard measures that would be adopted to control dust are set out in the OEMP [APP -187] (PWAIR1, MW-AIR1, MW-AIR2, MW-AIR4).</p>
11.07	<p>Potential for noise and vibration and air quality effects arising from construction activities to impact on the health of residents and local workers.</p>	<p>Local communities will be afforded careful consideration during the construction phase. The environmental effects on people during construction of the Scheme have been assessed in ES Chapter 5 - Air Quality [APP-043] section 5.9 and ES Chapter 9 - Noise and Vibration [APP-047] section 9.9, with consideration of the potential for impacts</p>

		<p>on human health given in ES Chapter 13 - People and Communities [APP-051], section 13.9.</p> <p>The Outline Environmental Management Plan (OEMP) in the ES Appendix 2.2 [APP-187], sets out measures that will be employed during construction to reduce, as far as is reasonably practicable, the potential for adverse impacts on local people, communities, and business including, for example, in relation to control of dust (PW-AIR1 and MW-AIR1), and noise (PW-NOI1, PW-NOI3, PW-NOI5, MW-NOI1, MW-NOI3 MW-NOI4, and MW-NOI6) and vibration (PW-NOI1, PW-NOI3, PW-NOI4, PW-NOI5, MW-NOI1, MW-NOI3, MW-NOI4, MW-NOI5, and MW-NOI6).</p> <p>Compliance with the OEMP is secured under paragraph 4 of Schedule 2 within the draft DCO [APP-020].</p>
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Table 11-5: Social and Community Issues: Negative Impacts - Operational

Ref	Negative Impacts- Operational	Highways England Response
11.08	<p>The potential impacts on farm holdings relate primarily to the loss, severance and fragmentation of agricultural holdings and the loss of agricultural infrastructure (such as field drainage, field water supplies, fencing, etc.) and the consequent impacts for the continued operation of the agricultural holdings and businesses.</p>	<p>There are no significant operational impacts on agricultural holdings arising from the Scheme (para 13.7.11, Chapter 13 of the ES [APP-051]). Farms operate close to motorways and trunk roads at present with no adverse impacts; the operation of the proposed scheme will present no new, novel operational impacts.</p>
11.09	<p>Permanent loss of driver views of the WHS, particularly the Stonehenge monument, and associated landscape along the tunnelled sections.</p>	<p>The People and Communities assessment concludes a significant adverse effect on drivers views through the WHS in the operational phase (para 13.9.51-55, Chapter 13 of the ES APP-051]).</p> <p>However, a principal aim of the Scheme, supporting the aims of the World Heritage Site Management Plan 2015, is to remove the A303 and the sight and sound of traffic from much of the WHS landscape, thereby re-uniting Stonehenge with its surrounding monuments in their natural chalk downland setting.</p> <p>Whilst the Stonehenge monument will not be visible from the A303 once the tunnel is built, there will be a significant opportunity for the public to explore the WHS landscape and view the Stonehenge monument from the enhanced public rights of way network, notably the restricted byway being created on the line of the existing road.</p>

Appendix A: Conformity with individual policies of the Development Plan

Ref.	Policy	Highways England's Response
A1.1	Wiltshire Core Strategy, Strategic objective 5	It is noted that subject to providing the mitigation of the Requirements suggested by Wiltshire, on balance a positive outcome to this objective is envisaged
A1.2	Wiltshire Core Strategy / Core Policy 6 - Stonehenge	It is noted that concerns still remain regarding the western part of the WHS, which the Council considers is going to be subject to adverse impact and a severance. Impacts on the setting of the whole of the WHS are considered in Chapter 6 of the ES [APP-044] and Appendix 6.3 [APP-194]. In the Case for the Scheme and NPS Accordance [APP-294], compliance with the equivalent NN NPS policy is also addressed (page A-94) in relation to impacts on the WHS.
A1.3	Wiltshire Core Strategy / Core Policy 50 – Biodiversity and Geodiversity	Wiltshire Council acknowledges that Highways England has recognised that the Scheme has potential to result in significant impact on features of nature conservation and geological value within the footprint of the Scheme and immediate surrounding landscape. However, the Council accepts that appropriate survey effort and mitigation design has been undertaken.
A1.4	Wiltshire Core Strategy / Core Policy 58 – Ensuring the conservation of the historic environment	See response to Core Policy 6 above

A1.5	Wiltshire Core Strategy / Core Policy 59 – The Stonehenge, Avebury and Associated Sites World Heritage Site	See response to Core Policy 6 above
A1.6	Wiltshire Core Strategy / Core Policy 67 Flood Risk	The Council notes that Highways England still need to address the issues raised by the peer review as detailed in the main report above. Highways England has responded to the peer review as part of its submission to Deadline 3.
A1.7	Wiltshire Core Strategy / Core Policy 68 Water Resources	Although the overarching strategy is now in place, the Council notes that Highways England will still need to supply further details on ground investigations prior to final approval by the Council. Details of the final drainage design details will be provided in order to discharge Requirement 10 of the DCO [see draft DCO, REP2-003] following consultation with Wiltshire Council.

Appendix B: Consolidated list of suggested requirements with reasons

Ref.	Archaeology and World Heritage Site Considerations		Requirement Discharged by:		Highways England's Response
	Requirement	Reason	Secretary of State	Wiltshire Council	
B1.01	<p>No development shall commence (including preliminary works) within scheme area until:</p> <p>a) A detailed archaeological mitigation strategy, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results and land use management plans, has been submitted to and approved by the Local Planning Authority; and</p> <p>b) The approved programme of archaeological work has been carried out in accordance with the approved details.</p>	To enable the mitigation of areas of archaeological significance.		X	This proposed requirement is not necessary, and so fails to satisfy the tests for requirements set out in paragraph 4.9 of the National Policy Statement for National Networks, as it would duplicate the effect of requirement 5 which requires the authorised development to be carried out in accordance with the Detailed Archaeological Mitigation Strategy [REP2-038] ("DAMS").

B1.02	<p>No development shall commence within scheme area until:</p> <p>a) A detailed programme for archaeology and heritage outreach (education and community), which should include educational / school's activities, talks and site visits, interpretation materials, community engagement, has been submitted to and approved by the Local Planning Authority; and</p> <p>b) The approved programme of archaeology and heritage education and community outreach work has commenced in accordance with the approved details.</p>	<p>To enable the local communities to be kept up to date which Archaeological discoveries and to maximise the public benefit from the Scheme</p>		X	<p>As above. Appendix F of the DAMS includes provision for community engagement, education and outreach.</p>
B1.03	<p>The Scheme must be reviewed in relation to its fit with other major development in the area such as army rebasing, developments at Boscombe Down and additional housing development locally. This will ensure that cumulative and consequential impacts on the</p>	<p>To avoid, minimise and mitigate cumulative impacts on the WHS and its OUV.</p>		X	<p>This proposed requirement is not necessary, and so fails to satisfy the tests for requirements set out in paragraph 4.9 of the National Policy Statement for National Networks. Chapter 15 of the Environmental Statement [APP-053] includes an</p>

	<p>WHS and its OUV are avoided or at least minimised and mitigated.</p>			<p>assessment of the cumulative effects, Appendix 15.2 [APP-291] includes the assessment of other schemes assessed cumulatively with the Scheme and the Heritage Impact Assessment [APP-195] similarly takes this into account. There is therefore already sufficient information to assess the cumulative and consequential impacts and the existing design and requirements in the draft DCO, in particular requirements 4 and 5 which secure compliance with the OEMP and DAMS respectively, appropriately regulate the cumulative effects of the Scheme on the WHS and its OUV.</p>
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Ref.	Local Transport		Requirement Discharged by:		Highways England's Response
	Requirement	Reason	Secretary of State	Wiltshire Council	
B1.04	<p>Traffic Monitoring and Mitigation</p> <p>(1) No part of the authorised development is to commence until written details of a traffic impact monitoring and mitigation scheme has been submitted to and approved in writing by the highway authority.</p> <p>(2) The traffic impact monitoring and mitigation scheme must include-</p> <p>(i) a before and after survey to assess the changes in traffic;</p> <p>(ii) the locations to be monitored and the methodology to be used to collect the required data;</p> <p>(iii) the periods over which traffic is to be monitored;</p> <p>(iv) the method of assessment of traffic data;</p>				<p>The Applicant notes that this proposed requirement is drawn from the A14 Cambridge to Huntingdon Improvement Scheme Order 2016. In the particular circumstances of that Scheme, this requirement may have been appropriate.</p> <p>The Applicant notes that requirement 9 of Schedule 2 to the draft DCO makes provision requires the Secretary of State's approval, following consultation with the local highway authority, of a traffic management plan before the commencement of any part of the Scheme. Measure MW-TRA2 of the OEMP [APP-187] makes further provision as to the contents of the Traffic Management Plan and includes additional obligations on the contractor consult</p>

	<p>(v) control sites to monitor background growth;</p> <p>(vi) the implementation of monitoring no less than 3 months before the implementation of traffic management on the existing A14;</p> <p>(vii) agreement of baseline traffic levels;</p> <p>(viii) the submission of survey data and interpretative report to the highway authority; and</p> <p>(ix) a mechanism for the future agreement of mitigation measures.</p> <p>(3) The scheme approved under sub- paragraph (1) must be implemented by the undertaker.</p>				<p>stakeholders when developing the traffic management plan.</p> <p>However, in the circumstances of this Scheme, where the Transport Assessment [APP-297] has concluded that the Scheme would deliver road safety, traffic flow and journey time benefit and does not result in unacceptable impacts to either the local or strategic road networks, a requirement of this nature is neither necessary nor reasonable and so fails to meet the tests in paragraph 4.9 of the National Policy Statement for National Networks.</p> <p>The Applicant notes that it is discussing with Wiltshire Council, in the context of the proposed legal agreement relating to matters arising from the highways that Wiltshire Council would adopt should the DCO be made, condition surveys.</p>
B1.05	<p>Highway lighting scheme</p> <p>(1) No part of the authorised</p>				<p>This proposed requirement fails to meet the tests in paragraph 4.9 of the National</p>

	<p>development is to commence until a written scheme of the proposed highway lighting and traffic signals controls to be provided for that part of the authorised development has been submitted to and approved in writing by the Secretary of State, following consultation with the relevant planning authority and, (in the case of proposed lighting or traffic signals for any highway for which the undertaker is not the highway authority), the local highway authority.</p> <p>(2) The standard of the highway lighting to be provided by the Scheme referred to in sub-paragraph (1) must either reflect the standard of the highway lighting included in the environmental statement or, where the standard of the highway lighting proposed materially differs from the standard of the highway lighting identified in the</p>			<p>Policy Statement for National Networks in that it is not necessary or reasonable in all other respects.</p> <p>The Applicant has included a series of commitments on lighting in the OEMP [APP-187], (references D-CH8 to D-CH12 inclusive), which would lead to the Scheme largely being unlit and where lit designed to minimise light spill. Compliance with the OEMP is secured by requirement 4 of the draft DCO.</p> <p>In respect of Wiltshire Council’s concerns relating to highways for which it will become the highway authority, the Applicant and Wiltshire Council are negotiating a legal agreement which the parties intend to conclude before the close of the examination.</p>
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	<p>environmental statement, the undertaker must provide evidence with the written scheme submitted for approval that the standard of the highway lighting proposed would not give rise to any materially new or materially worse adverse environmental effects in comparison with those reported in the environmental statement taking into account the lighting identified in it. The standard of the highway lighting must encompass the specification, level of provision, light spillage, intensity, brightness and uniformity of the highway lighting.</p> <p>(3) The authorised development must be carried out in accordance with the scheme approved under sub-paragraph (1).</p> <p>(4) Nothing in this requirement restricts lighting of the authorised development during its construction or</p>				
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	where temporarily required for maintenance.				
B1.06	<p>Amendments to approved details</p> <p>With respect to any requirement which requires the authorised development to be carried out in accordance with the details approved under this Schedule, the approved details are taken to include any amendments that may subsequently be approved in writing.</p>				<p>This proposed requirement fails to meet the tests in paragraph 4.9 of the National Policy Statement for National Networks in that it is not necessary or reasonable in all other respects.</p> <p>This is on the basis that there is no need for this additional proposed requirement, as paragraph 1(2)(b) of Part 1 of Schedule 2 of the draft DCO [REP—003] has the same effect.</p>
B1.07	<p>Traffic Management</p> <p>Submission of a Traffic Management Plan which makes clear provision for the traffic management proposals on a phased basis, with all TM stages within each phase of the works to have previously been agreed (acting reasonably) with the Wiltshire Network Manager.</p> <p>Wiltshire Council will expect to be consulted and involved in all</p>	To manage the effect of the works on local traffic movements			<p>Requirement 9 of the draft DCO, together with reference MW-TRA2 of the OEMP go further than this proposed requirement and include obligations to consult Wiltshire Council.</p> <p>In respect of traffic management during tunnel closures once the Scheme is in operation, the Applicant is seeking to agree a protocol for co-operation during the</p>

	<p>aspects of traffic management and the impacts on the local network.</p> <p>Traffic Management during Tunnel Closures The main works contractor shall, prior to the handover of the works to Highways England, prepare, in consultation with Wiltshire Council, a Tunnel Closure Management Plan (TCMP) setting out, inter alia, the following;</p> <p>(1) Procedures to be followed for the planned closure of a single bore, including use of temporary signing, and advance information proposals.</p> <p>(2) Procedures to be followed for unplanned closures of a single or both tunnel bores, either during or outside a planned closure, with particular reference to:</p> <ul style="list-style-type: none"> • method of control of access to the eastbound or westbound or both merge slips at 			<p>operation of the Scheme as part of a legal agreement between the parties. This would appropriately address the underlying concern which is the co-ordination of each authority's networks to planned and unplanned tunnel closure. In view of those discussions, the Applicant considers the proposed requirement to be unnecessary.</p>
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	<p>Longbarrow or Countess junctions respectively.</p> <ul style="list-style-type: none"> • Signage to be employed on the approved diversion route. • Measures to be taken at a regional/sub national level to alert drivers of A303 delays • Requirements to liaise with Wiltshire Council's Streetworks Team and the police 				
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Ref.	Public Rights of Way (PROW)		Requirement Discharged by:		Highways England's Response
	Requirement	Reason	Secretary of State	Wiltshire Council	
B1.08	1. The legislative process by which the creation, diversion and extinguishment (stopping-up) of the affected public rights of way needs to be clarified with particular regard to whether the confirmation of the legal orders enables of itself the council to amend the Definitive Map and Statement, or whether further orders will need to be made by the council to enable those amendments.		X		<p>The Applicant notes that this proposed requirement is not in the form of a requirement.</p> <p>In response to the question the Scheme's proposals for public rights of way are shown on the Rights of Way and Access Plans [APP-009] and described in Schedule 3 to the draft DCO. Article 10 of the draft DCO [APP-020] would provide the legislative basis for the creation, diversion and extinguishment of highways, if the DCO is made by the Secretary of State in the form applied for by Highways England. The exercise by Highways England of the power in Article 10 would give effect to the creation, diversion and extinguishment of streets and private means of access, as shown on the Rights of Way and Access plans and as</p>

					<p>provided for in the DCO. There would be no need for Wiltshire Council to make any further stopping up order(s).</p> <p>Once the powers in article 10 have been exercised by the Applicant the Council would need to prepare a modification order(s) to amend the particulars contained in the Definitive Map and Statement. The Applicant and Wiltshire Council are negotiating a legal agreement intended to address issues arising from Wiltshire Council's maintenance of highways created or affected by the Scheme. The parties intend to conclude that agreement prior to the close of the examination.</p>
B1.08 (cont)	2. Where the diversion and creation of new sections of public rights of way will lead to the new routes becoming maintainable at public expense by the council as Highway Authority, design and construction details and			X	<p>As detailed in section 3.8.2 of the Statement of Common Ground with Wiltshire Council submitted at Deadline 2 [REP2-018], Article 9(1) of the draft DCO [APP-020] requires Highways England to complete any new highways to</p>

	<p>specifications must be agreed by the authority prior to the commencement of works, and to be certified by the authority on completion as having been provided to the required standard before the authority accepts responsibility. Any requirements for the payment to the council of commuted sums to cover / assist with the costs of maintenance of the new routes must also be agreed before the council accepts responsibility.</p>				<p>the reasonable satisfaction of Wiltshire Council who will become responsible for its maintenance. The parties agree that matters relating to the highways that Wiltshire Council would become liable to maintain, as a result of the Scheme, are capable of being resolved through the terms of a legal agreement between the parties. The parties intend to conclude such an agreement before the close of the examination.</p>
B1.08 (cont)	<p>3. Where temporary diversions or closures of public rights of way are necessary during the construction phase, the construction details of alternative routes to be provided must be agreed in advance with the council as Highway Authority.</p>			X	<p>Wiltshire Council will be consulted on the contents of a Traffic Management Plan pursuant to paragraph 9 of Schedule 2 to the draft DCO [APP-020]. Matters to be included in this plan are set out in reference MW-TRA2 of the Outline Environmental Management Plan [APP-147], compliance which is secured by paragraph 4 of Schedule 2 to the draft DCO. MW-TRA 2</p>

					<p>requires at references paragraphs c), d) and e) measures relevant to the diversion of public rights of way during construction.</p> <p>This is also detailed in section 3.8.3 of the Statement of Common Ground with Wiltshire Council submitted at Deadline 2 [REP2-018].</p> <p>In view of these measures the Applicant considers the proposed requirement to be unnecessary, and therefore non-compliant with the tests in paragraph 4.9 of the National Policy Statement for National Networks, because its subject matters is already addressed in the existing draft DCO.</p>
B1.08 (cont)	<p>4. Where there are expected to be adverse effects on the use of existing rights of way and increased requirements for maintenance, appropriate mitigation measures are to be agreed with the Council. These could be achieved through the provision of a commuted sum to meet</p>		X		<p>As detailed in section 3.8.2 of the Statement of Common Ground with Wiltshire Council submitted at Deadline 2 [REP2-018]. Article 9(1) of the draft DCO [APP-020] requires Highways England to complete any new highways to the reasonable satisfaction of Wiltshire Council who will</p>

	<p>costs incurred as a direct result of the Scheme.</p>				<p>become responsible for its maintenance. The parties agree that matters relating to the highways that Wiltshire Council would become liable to maintain, as a result of the Scheme, are capable of being resolved through the terms of a legal agreement between the parties. The parties intend to conclude such an agreement before the close of the examination.</p>
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Ref.	Ecology and Landscape		Requirement Discharged by:		Highways England's Response
	Requirement	Reason	Secretary of State	Wiltshire Council	
B1.09	<p>APPROVAL OF LANDSCAPING BEFORE COMMENCEMENT</p> <p>No development shall commence on site until a scheme of hard and soft landscaping has been submitted to and approved in writing by the Local Planning Authority, the details of which shall include:</p> <ul style="list-style-type: none"> • location and current canopy spread of all existing trees and hedgerows on the land; • full details of any to be retained, together with measures for their protection in the course of development; • a detailed planting specification showing all 	<p>The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.</p>		X	<p>This requirement is not needed, as the updated Outline Environmental Management Plan (OEMP) submitted at Deadline 3 sets out the requirement for the main works contractor to prepare a Landscape and Ecology Management Plan (LEMP) (MW-LAN1), in accordance with industry good practice and for it to be approved prior to the commencement of the relevant works. The principles for the LEMP are set out in the Outline Landscape and Ecology Management Plan ('OLEMP') [APP-267]. The OEMP is secured under Requirement 4 of the draft DCO.</p> <p>In addition, under requirement 8 of Schedule 2 of the draft DCO, Highways England will</p>

	<p>plant species, supply and planting sizes and planting densities;</p> <ul style="list-style-type: none"> • finished levels and contours; • means of enclosure; • other vehicle and pedestrian access and circulation areas; • all hard and soft surfacing materials; • minor artefacts and structures (e.g. furniture, play equipment, refuse and other storage units, signs, lighting etc.); • proposed and existing functional services above and below ground (e.g. drainage, power, communications, cables, pipelines etc. indicating lines, manholes, supports etc.); 			<p>be required to submit a detailed landscaping scheme, for the approval of the Secretary of State following consultation with the local planning authority, on the basis of the mitigation measures set out in the ES, which includes the OLEMP. The main works contractor will prepare a final version of the CEMP for the operational and maintenance phase of the Scheme in the form of a Handover Environmental Management Plan (HEMP) (required by the OEMP to be based on the CEMP and the LEMP in effect at the time). Each CEMP, (including the LEMP, HEMP and any other accompanying method statements), will be developed in consultation with Highways England and the relevant stakeholders (which include Wiltshire Council) as set out in the OEMP. As set out in the OEMP,</p>
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	<ul style="list-style-type: none"> retained and created habitat features provided as mitigation or enhancement for named species. retained historic landscape features and proposed restoration, where relevant. 			<p>MW-BIO2, the main works contractor must establish the new habitats identified within the Environmental Masterplan (ES Figure 2.5) [APP-059] within the Order limits and manage them accordingly to ensure their establishment and development to achieve their target purpose(s), through to any handover of the Scheme.</p> <p>The Applicant considers the Secretary of State, in consultation with the local planning authority, would be the appropriate person to be responsible for approving the landscaping scheme for this nationally significant infrastructure project under requirement 8. The Applicant's revised DCO for submission at deadline 3 includes a new paragraph that requires the details to be submitted to the Secretary of State to reflect consultation responses where it is appropriate, reasonable and feasible to do so, taking into account considerations</p>
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					<p>including , but not limited to, cost and engineering practicality.</p> <p>Taking all of these other existing provisions together, the Applicant considers that the proposed requirement is unnecessary, and therefore fails to meet the tests in paragraph 4.9 of the National Policy Statement for National Networks as it would duplicate the controls already in place in the draft DCO.</p>
B1.10	<p>Prior to the commencement of any preliminary or enabling works, a programme of precautionary protective measures for sensitive ecological receptors will be submitted for agreement. This will take the form of a series of CEMPs for each phase and /or location within the project.</p>		X		<p>In respect of the preliminary works, the Table 3.2a of the OEMP [APP-187] includes extensive measures for the protection of protected species and the prevention of the spread of non-native invasive species, see references PW-BIO1 to PW-BIO10. Compliance with the preliminary works OEMP is secured by requirement 4. In respect of enabling works excluded from the definition of "commence" in article 2(1) of the draft DCO, these activities</p>

					<p>have been assessed as being unlikely to give rise to significant effects.</p> <p>In the Applicant's view the proposed requirement fails to meet the tests in paragraph 4.9 of the National Policy Statement for National Networks in that it is (i) not necessary and not reasonable in all other respects.</p>
B1.11	<p>No part of the authorised development is to commence until a Landscape and Ecological Management Plan for the Scheme has been submitted to and approved in writing by the Secretary of State, following consultation with the planning authority.</p>		X		<p>The OEMP sets out the requirement for the main works contractor to prepare a Landscape and Ecology Management Plan (LEMP) (MW-LAN1), in accordance with industry good practice. The principles for the LEMP are set out in the Outline Landscape and Ecology Management Plan ('OLEMP') [APP-267]. The OEMP is secured under Requirement 4 of the draft DCO.</p> <p>In addition under requirement 8 of Schedule 2 of the DCO, Highways England will be required to submit a detailed</p>

				<p>landscaping scheme for the approval of the Secretary of State following consultation with the local planning authority, which is required to be on the basis of the mitigation measures set out in the ES, which includes the OLEMP. The main works contractor will prepare a final version of the CEMP for the operational and</p> <p>maintenance phase of the Scheme in the form of a Handover Environmental Management Plan (HEMP) (required by the OEMP to be based on the CEMP and the LEMP in effect at the time).</p> <p>Consequently, in the Applicant's view the proposed requirement fails to meet the tests in paragraph 4.9 of the National Policy Statement for National Networks as it would not be necessary in view of the existing measures that would be secured through the OEMP, under requirement 4,</p>
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					and the landscaping Scheme secured under requirement 8.
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Ref.	Built Heritage		Requirement Discharged by:		Highways England's Response
	Requirement	Reason	Secretary of State	Wiltshire Council	
B1.12	No external lighting shall be installed on site until a scheme of streetlighting, including the measures to be taken to minimise sky glow, glare and light trespass, has been submitted to and approved in writing by the Local Planning Authority. The external lighting scheme shall be designed so as to meet the criteria for Environmental Zone E1 as defined by the Institute of Lighting Professionals 'Guidance Notes for the Reduction of Obtrusive Light' 2012. The approved scheme shall be implemented in full before the development is first brought into use and shall be maintained in effective	To minimise the impact of the external lighting and in the interests of the setting of designated heritage assets.		X	<p>This seems to duplicate at least in part item B1.05 above.</p> <p>The Applicant has included a series of commitments on lighting in the OEMP [APP-187], references D-CH8 to D-CH12 inclusive, which would lead to the Scheme largely being unlit. Compliance with the OEMP is secured by requirement 4 of the draft DCO.</p> <p>In addition, Highways England notes that in principle it would be inappropriate for the local planning authority to be responsible for approving street lighting on the trunk road network. In respect of local roads, Wiltshire Council</p>

	<p>working order at all times thereafter.</p>			<p>will itself be the highway authority and will be in a position, once those roads have been adopted, to regulate the lighting of them in accordance with its functions under the Highways Act 1980.</p> <p>Therefore, the proposed requirement fails to meet the tests in paragraph 4.9 of the National Policy Statement for National Networks in that it is not necessary, when considered alongside the other control measures secured through requirement 4 or reasonable in all other respects when considered in the context of the authorities' respective functions.</p>
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Ref.	Built Heritage		Requirement Discharged by:		Highways England's Response
	Requirement	Reason	Secretary of State	Wiltshire Council	
B1.12	No external lighting shall be installed on site until a scheme	To minimise the impact of the external lighting and in		X	This seems to duplicate at least in part item B1.05 above.

	<p>of streetlighting, including the measures to be taken to minimise sky glow, glare and light trespass, has been submitted to and approved in writing by the Local Planning Authority. The external lighting scheme shall be designed so as to meet the criteria for Environmental Zone E1 as defined by the Institute of Lighting Professionals 'Guidance Notes for the Reduction of Obtrusive Light' 2012. The approved scheme shall be implemented in full before the development is first brought into use and shall be maintained in effective working order at all times thereafter.</p>	<p>the interests of the setting of designated heritage assets.</p>		<p>The Applicant has included a series of commitments on lighting in the OEMP [APP-187], references D-CH8 to D-CH12 inclusive, which would lead to the Scheme largely being unlit. Compliance with the OEMP is secured by requirement 4 of the draft DCO.</p> <p>In addition, Highways England notes that in principle it would be inappropriate for the local planning authority to be responsible for approving street lighting on the trunk road network. In respect of local roads, Wiltshire Council will itself be the highway authority and will be in a position, once those roads have been adopted, to regulate the lighting of them in accordance with its functions under the Highways Act 1980.</p> <p>Therefore, the proposed requirement fails to meet the tests in paragraph 4.9 of the National Policy Statement for</p>
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					National Networks in that it is not necessary, when considered alongside the other control measures secured through requirement 4 or reasonable in all other respects when considered in the context of the authorities' respective functions.
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Ref.	Public Health and Protection		Requirement Discharged by:		Highways England's Response
	Requirement	Reason	Secretary of State	Wiltshire Council	
B1.13	<p>a) An OEMP then CEMP are to be submitted following consultation with the Local Authority in writing prior to the commencement of the construction phase.</p> <p>Noise and vibration Construction Phase:</p> <p>b) A quantitative assessment of noise and vibration impacts arising from construction works must be undertaken and included in the Environmental Statement that will be submitted with the DCO application.</p> <p>c) A scheme of mitigation shall be submitted to and approved in writing by the Secretary of State following consultation with the Local Authority to provide that the maximum change in traffic</p>	<p>To ensure sufficient nuisance mitigation measures are taken to safeguard residents and protect the local Environment and residential amenity.</p>	<p>X</p>	<p>X</p>	<p>It is understood that Wiltshire Council are currently reviewing their proposed noise and vibration requirements to determine if matters are already covered elsewhere in the DCO documentation. Notwithstanding this, the responses below are based on the position as set out in the LIR.</p> <p>Construction Phase</p> <p>a) An OEMP was submitted with the Application [APP-187] and has been updated for submission at deadline 3. The OEMP requires CEMPs to be prepared and submitted for the approval of the Authority, following consultation with Wiltshire Council and other bodies as specified in the OEMP prior to the</p>

	<p>noise level for sensitive receptors exposed to external road traffic noise shall not create a significant adverse impact in Amesbury as defined in 9.3.51 and 9.3.52 of Chapter 9 of the Environmental Statement. Any scheme of noise mitigation as approved shall be constructed in its entirety as soon as reasonably practicable in pursuance of the scheme and shall be retained thereafter in perpetuity.</p> <p>d) A Requirement to meet prior consent process methodology scheme with the local authority (as under Section 61 of the Control of Pollution Act 1974) shall be followed in respect to the construction phase of the scheme, but without the formal submission. This paperwork would then equate to a BPM assessment.</p>			<p>X</p>	<p>commencement of the relevant works. In the Applicant's view the proposed requirement is unnecessary as its subject matter is appropriately addressed in the OEMP, compliance with which is secured through paragraph 4 of the dDCO.</p> <p>b) Chapter 9 of the Environmental Statement (ES) [APP-047] details the quantitative assessment of potential noise and vibration effects during construction. It is therefore unnecessary, and not reasonable in all other respects, to require an additional quantitative assessment when one has been carried out and included in the Environmental Statement.</p> <p>c) Responded to in Operational Phase f) below</p>
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	<p>level by more than 0 db(A) at any residential property when assessed in accordance with BS 4142: 2014</p> <p>h) Vibration levels in relation to piling and tunnelling works or 1.0 mms-1 to be set as a level trigger alert for affected residents. Temporary re-housing to be offered to residents at Stonehenge Cottages if the monitoring of vibration levels at the Cottages on the approach of the TBM indicates that PPV levels exceeding 1mm/s are likely to occur continuously for a period of 48hrs or more during each tunnel bore.</p>			<p>undertaken outside of core hours (not including repairs or maintenance) prior to undertaking the works. Highways England therefore consider that this matter is adequately addressed in existing DCO Requirements.</p> <p>e) Except in the case of an emergency PW-G4 and MW-G12 of the OEMP requires an application to be made to Wiltshire Council under Section 61 of the Control of Pollution Act 1974 for any works undertaken outside of core hours (not including repairs or maintenance) prior to undertaking the works. In the Applicant's view the proposed requirement is unnecessary as its subject matter is appropriately addressed in the OEMP, compliance with which is secured through Paragraph 4 of Schedule 2</p>
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				<p>of the draft Development Consent Order (dDCO).</p> <p>f) Works at Countess Junction and River Till viaduct fall within the chainages which are subject to shorter site specific working hours as set out in the OEMP (MW-G13). Provision is also made for environmental risk assessments prior to piling at both these locations under MW-G9. The revised OEMP submitted at deadline 3 also includes a commitment to non-impact piling methods at Countess Junction (D-NOI4) and the River Till viaduct (MW-BIO3). Compliance with the OEMP is secured by Paragraph 4 of Schedule 2 of the draft Development Consent Order (dDCO). Separate working hours for piling have not been proposed. The proposed</p>
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					<p>type of piling, secured and controlled under the OEMP as set out above, is not considered to give rise to distinctive noise disturbance which would warrant its own set of working hours. On this basis Highways England consider that this matter is already adequately addressed in the DCO Requirements.</p> <p>f) With regard to noise from fixed plant at the service buildings this is addressed in Operational phase a) below. With regard to noise from generators, BS 4142:2014 relating to industrial noise explicitly excludes construction noise from the scope of the standard. On this basis Highways England do not consider this requirement as it relates to generators at the compounds during construction is</p>
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				<p>appropriate. However, mitigation of noise from generators will be secured through the Noise and Vibration Management Plan which will be developed in consultation with Wiltshire Council (MW-G5).</p> <p>g) A commitment to the offer of temporary rehousing to residents at Stonehenge Cottages, if the monitoring of vibration levels at the Cottages on the approach of the TBM indicates that PPV levels exceeding 1mm/s are likely to occur continuously for a period of 48hrs or more during each tunnel bore, has been added to the revision of the OEMP to be submitted at Deadline 3 (MW-NOI5). The vibration monitoring requirements are set out in MW-NOI6. Compliance with the OEMP is secured by Paragraph 4 of Schedule 2 of the draft</p>
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					Development Consent Order (dDCO). This commitment is agreed under 3.3.12 of the Statement of Common Ground (SoGC) with Wiltshire Council submitted at Deadline 2. On this basis Highways England consider that this matter is adequately addressed in the DCO Requirements.
B1.13 (cont)	<p>Operational Phase:</p> <p>a) Details of noise associated with the operation of plant serving the tunnel are to be agreed by the Secretary of State following consultation with the Local Authority in writing prior to its commissioning. The rating level of the noise above background emitted from fixed plant located at the service buildings at the tunnel portals shall not exceed 0 dB (A) at any residential property when measured and corrected in accordance with BS 4142: 2014.</p>			X	<p>Operational Phase</p> <p>a) A new obligation for the rating level of the noise emitted from fixed plant located at the service buildings at the tunnel portals to not exceed the background by more than [0 dB(A) above background at any residential property when assessed in accordance with BS 4142: 2014], has been included in the revision of the OEMP to be submitted at Deadline 3 (D-NO13). The obligation to comply with the OEMP is secured by paragraph 4 of</p>

	<p>b) Road noise exposure shall be minimised for receptors from the viaduct over the River Till north of Winterbourne Stoke, and from the flyover at the Countess roundabout to protect the local amenity.</p> <p>c) Design, mitigation and enhancement measures, the proposed barriers and cladding to mitigate the noise of Operations are described in para 9.8.14 as follows:</p> <p>9.8.14 d)</p> <p>The use of a noise absorbent finish at the entrance/exit of the tunnel and Green Bridge Four, further details are provided in Appendix 9.3: (Table 2.1) has been specified and acoustic enhancement is included in the modelled data based on:</p> <p>Table 2-1 details the absorption coefficient assumed for the entrance / exit of the tunnel and green bridge 4. This is based on</p>		<p>X</p> <p>X</p> <p>X</p>	<p>X</p>	<p>Schedule 2 in the draft Development Consent Order (dDCO). It is therefore unnecessary to include the proposed requirement as it would duplicate the controls contained in the OEMP.</p> <p>b) As detailed in the Statement of Common Ground (SoCG) between Highways England and Wiltshire Council, which was submitted to the Examination as a draft SoCG at deadline 2, Wiltshire Council is understood to be content that the proposed operational mitigation is suitable and sufficient. Operational mitigation is secured through the revised OEMP to be submitted at deadline 3 (see D-NOI1, D-NOI2, D-NOI5, D-NOI6, D-LAN2), compliance with which is secured by Paragraph 4 of Schedule 2 in the draft Development Consent Order (dDCO). On this basis Highways England consider that this matter is adequately addressed as part of the DCO</p>
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	<p>typical tunnel sound absorbing treatment contained within the noise modelling software.</p> <p>Table 2-1: Absorption coefficient assumed for the entrance/exit of the tunnel and green bridge 4.</p> <table border="1" data-bbox="324 659 784 946"> <thead> <tr> <th colspan="4">Frequency range (Hz) absorption coefficient</th> </tr> <tr> <th><160</th> <th>160-400</th> <th>500-1600</th> <th>>1600</th> </tr> </thead> <tbody> <tr> <td>0.15</td> <td>0.50</td> <td>0.80</td> <td>0.65</td> </tr> </tbody> </table> <p>9.8.14 g) Inclusion of 1.8m high absorptive noise barriers between the slip roads on both the north and south side of Countess flyover; and</p> <p>9.8.14 h)</p>	Frequency range (Hz) absorption coefficient				<160	160-400	500-1600	>1600	0.15	0.50	0.80	0.65			<p>submission and that the inclusion of the proposed requirement would unnecessarily duplicate control.</p> <p>c) As detailed in section 9.8 of the ES [APP-047] the exact performance specification of specific operational mitigation measures would be confirmed at the detailed design stage.</p> <p>The use of a noise absorbent finish at the entrance/exit of the tunnel and Green Bridge Four has been included in the revised OEMP to be submitted for deadline 3 (D-NOI6). Compliance with the OEMP is secured by Paragraph 4 of Schedule 2 of the dDCO.</p> <p>The design of the surface finish of the retaining wall at the approaches to the tunnel portals and at Countess flyover (above the earthworks) to reduce the reflection of noise is included in the ES as an enhancement measure which has not been included in</p>
Frequency range (Hz) absorption coefficient																
<160	160-400	500-1600	>1600													
0.15	0.50	0.80	0.65													

	<p>produced must address the local conditions, and properly evaluate potential impacts once details of the construction are known. Any CEMP produced should by definition address the following:</p> <ul style="list-style-type: none"> • A list of tasks to be completed • Task method statements including plant lists • Durations of tasks • Identify local receptors (based on potential impact of tasks) • Assessment of impact using standards identified above • Identification of mitigation measures • Compliance monitoring <p>A complaint management system is included as part of the OEMP. Complaint management</p>		<p>X</p>	<p>Regulations is a legal requirement for noise barrier suppliers. It would be unnecessary to duplicate that requirement in the draft DCO and would not be reasonable in all other respects.</p> <p>e) Item MW-G7 in the Outline Environmental Management Plan (OEMP) requires the main works contractor to prepare a Noise and Vibration Management Plan. As set out in the OEMP, the Construction Environmental Management Plan (CEMP), to which the Noise and Vibration Management Plan will be appended (MW -G7), will be developed in consultation with Wiltshire Council (MW -G5). Item MW-NOI3 provides further details on the content of the Noise and Vibration Management Plan and requires the integration of noise control measures into the preparation of all method statements for the works.</p>
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	<p>is a necessary part of contract management. The complaint management procedure anticipates that non-compliances with the CEMP's are addressed promptly. There should also be an escalation procedure to ensure that urgent action can be taken.</p> <p>f) A scheme of mitigation shall be submitted to the Secretary of State following consultation with the Local Authority to provide that the maximum change in traffic noise level for sensitive receptors exposed to external road traffic noise shall not create a significant adverse impact as defined in 9.3.51 and 9.3.52 of Chapter 9 of the Environmental Statement.</p> <p>Any scheme of noise mitigation as approved shall be constructed in its entirety as soon as reasonably practicable in pursuance of the scheme and shall be retained thereafter in perpetuity.</p> <p>g) No development, (including construction, land raising and</p>		<p>X</p>	<p>The Noise and Vibration Management Plan will be produced by the contractor and would include details of the system for responding to any noise or vibration complaints received during construction. The CEMP will also be developed in consultation with Wiltshire Council (MW-G5). There is scope within this engagement with Wiltshire Council to discuss how to ensure no conflict of interest arises. In addition, the OEMP contains community liaison obligations (see, for example, MW -G31 and G32) and requires the appointment of a Community Relations Manager responsible for maintaining a log of complaints. On this basis Highways England considers that this matter is adequately addressed in the OEMP, compliance with which is secured by Paragraph 4 of Schedule 2 of the dDCO and the inclusion of the proposed requirement would be to</p>
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	<p>demolition if required) shall be carried out other than in accordance with a Construction Environment Management Plan (CEMP) that has been approved by the Secretary of State following consultation with the local authority.</p>			<p>unnecessary duplicate that control.</p> <p>f) Highways England consider that this matter is adequately addressed in existing DCO Requirements. Three mitigation measures listed in paragraph 9.8.14 are included in the DCO submission OEMP, compliance with which is secured by paragraph 4 of Schedule 2 to the draft DCO: Thin road surfacing: D-NOI1, Countess Flyover Noise Barriers: D-NOI2, River Till viaduct solid parapet: D-LAN2. A further two operational noise mitigation (or enhancement) measures are included in the revised OEMP submitted at deadline 3; noise absorbent material at the entrance/exit of the tunnel and Green Bridge Four: D-NOI6, and the the surface finish of the retaining wall at the approaches to the tunnel portals and at Countess flyover (above the earthworks)</p>
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				<p>to reduce the reflection of noise: D-NOI5. The remaining mitigation measures in paragraph 9.8.14 relate to the horizontal and vertical alignment including the tunnel, earthworks and retaining walls, and are secured through paragraph 3 of Schedule 2 to the draft DCO [APP-020]. Highways England therefore considers that neither Wiltshire Council nor the Secretary of State needs to approve these measures, as they will be committed to during the examination in the form of the certified OEMP .</p> <p>g) As set out in 3.14.2 of the Statement of Common Ground (SoCG) with Wiltshire Council, which was submitted to the Examination as a draft SoCG at deadline 2, Highways England consider that this matter is adequately addressed in existing DCO Requirements. Wiltshire Council will be consulted on</p>
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					the CEMP which will be developed once a contractor is appointed. The CEMP will be prepared in accordance with the OEMP pursuant to the requirement contained in paragraph 4 of Schedule 2 to the draft Development Consent Order (dDCO).
B1.14	<p>Air Quality</p> <p>Construction Phase</p> <p>a) No materials shall be burnt on the development site during the construction phase of the scheme.</p> <p>b) Traffic diversions should not involve routing traffic through AQMAs.</p> <p>c) Tunnel spoil to be disposed of in such a manner as to prevent a negative impact on Wiltshire AQMAs where transported by road and so as to ensure effective mitigation of dust during landscaping.</p> <p>d) An assessment of the air quality implications of</p>	<p>To ensure sufficient nuisance mitigation measures are taken to safeguard residents and protect the local Environment and residential amenity. To minimize additional traffic air pollution in other AQMAs.</p>	<p>X</p> <p>X</p> <p>X</p> <p>X</p>		<p>Air Quality</p> <p>Construction Phase</p> <p>a) The OEMP, ref AIR1, requires the main works contractor to manage dust, air pollution and exhaust emission during construction works in accordance with best practicable means which would preclude the burning of materials unrelated to a construction process. Compliance with the OEMP is secured by requirement 4. In the Applicant's view the inclusion of this proposed requirement would be to unnecessarily duplicate</p>

	<p>transportation of tunnel arisings shall be carried out prior to any disposal outside of the development site. This should identify any potential impacts on residents in proximity to the proposed haulage routes, including locations within AQMAs, and identify appropriate measures to mitigate any potentially significant impacts.</p> <p>e) To ensure that emission rates assumed for the construction vehicles are reasonable conservative, it is recommended that emission rates used should be compared with emissions from the actual construction vehicles proposed, as part of the ongoing assessment and management of construction phase impacts.</p> <p>Operational Phase</p> <p>a) An assessment of the legacy impact of the development shall be undertaken on the Air Quality on A36 and A350</p>	<p>To minimise additional traffic air pollution in other AQMAs.</p> <p>To monitor the impact of the project on existing local AQMAs</p>	<p>X</p>	<p>controls that are already in place in the OEMP.</p> <p>b) Highways England acknowledge that whilst traffic diversions may take place through Salisbury AQMAs (Regional Diversion), this will only be as a result of accidents or maintenance, as is currently the case. There are no planned diversions through AQMAs in construction phase 1 or 2 (as described in Chapter 2 of the ES [APP-040]). The regional diversionary routes are not expected to be utilised frequently and are not anticipated to cause a significant air quality effect in relation to annual air quality standards, for either annual averages or in terms of the number of permissible 1-hour exceedances (18 per year). A conclusion of no significant air quality effects from traffic management was included in Table 5.4: Scoping Opinion</p>
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	<p>AQMAs and mitigation measures shall be implemented where a negative impact on Air Quality is predicted / identified at relevant receptors</p>			<p>and response [APP-043]. Details of traffic management will be set out in the traffic management plan (pursuant to Regulation 9 (Traffic management) under Schedule 2 of the DCO [APP-020]) that will be consulted upon with Wiltshire Council, prior to the commencement of the relevant part of the authorised development. Pursuant to section MW-TRA and Table 2.1 of the OEMP, this will include a number of measures to control haul routes used and construction traffic management. On this basis, the Applicant considers that the inclusion of the proposed requirement is unnecessary as the matter is appropriately addressed under Requirement 9 and in the OEMP, compliance with which is secured by requirement 4.</p> <p>c) Measures for the management of dust are set out in the Outline</p>
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				<p>Environmental Management Plan (OEMP) [APP-187] (MW-AIR1, MW-AIR2, and MW-AIR4), as secured through paragraph 4 of Schedule 2 of the draft Development Consent Order. These measures will apply to the spread of arisings on the land east of Parsonage Down as this forms part of the Scheme. See Row 3.10.8 of the Wiltshire SoCG in the agreed air quality section.</p> <p>The inclusion of the proposed requirement is therefore unnecessary, as its subject matter is appropriately addressed in the OEMP, compliance with which is secured by requirement 4.</p> <p>d) Off-site disposal of tunnel arisings is not proposed as part of the Scheme. To the extent any arisings were being transported, the controls set</p>
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				<p>out under items (b) and (c) above would apply.</p> <p>e) The Applicant notes that this comment relates to the assessment of effects in the environmental statement and is not in the form of a requirement. Since the preparation of the Local Impact Report further discussions have taken place between the Applicant and Wiltshire Council. Row 3.10.10 of the Statement of Common Ground with Wiltshire Council confirms agreement that this matter is adequately addressed. In the Applicant's view it would be unnecessary to include the proposed requirement as it would duplicate controls already in place in the OEMP, compliance with which is secured by requirement 4.</p> <p>Operational Phase</p>
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					<p>a) The AQMAs listed are not within the air quality study area and so perceptible changes (i.e. more than 0.4 µg/m³) in air quality are not expected. Additionally, the changes that are predicted are for reduced traffic. No legacy air quality monitoring is therefore proposed, and Wiltshire Council are in agreement that operational air quality monitoring is not required following further discussion. A DCO Requirement relating to this matter is therefore not considered necessary. See Row 3.10.13 of the Wiltshire SoCG in the agreed air quality section.</p>
B1.15	<p>Light Nuisance</p> <p>a) All artificial lighting shall be so sited as not to cause light intrusion or nuisance to residential dwellings in the area adjacent to the scheme.</p> <p>b) Prior to the installation of the any floodlighting scheme for depot areas, full</p>	<p>To ensure sufficient nuisance mitigation measures are taken during the construction phase to safeguard residents and the local environment.</p>	X		<p>Lighting has already been raised in response to items B.1.05 and B.1.12. In addition to the point made in response to those items, and considering the specific points in this item B.1.15:</p>

	<p>details shall be submitted to and approved in writing by the Local Authority, details to be provided shall be:</p> <p>Light into neighbouring residential windows generated from the floodlights shall not exceed 5 Ev (lux) (vertical illuminance in lux) without the express consent of the local authority.</p> <p>Each floodlight must be aligned to ensure that the upper limit of the main beam does not exceed 70 degrees from its downward vertical.</p> <p>The floodlighting shall be designed and operated to have full horizontal cut-off and such that the Upward Waste Light Ratio does not exceed 2.5%.</p> <p>The submitted scheme shall include an isolux diagram showing the predicted illuminance in the vertical plane (in lux) at critical locations on the boundary of the site and at</p>			<p>A) Under the OEMP, full and detailed CEMP(s) will be prepared for each phase of the main works, in consultation with Wiltshire Council, prior to the commencement of that phase.</p> <p>This will include information as to lighting, which must be in accordance with the provisions of item MW-G29 of the OEMP, which set out that lighting should also be designed, positioned and directed so as not to unnecessarily intrude on adjacent buildings, ecological receptors, structures used by protected species and other land uses to prevent unnecessary disturbance, interference with local residents, or passing motorists. Compliance with the OEMP is secured through requirement 4 of Schedule 2 to the draft DCO.</p> <p>B) Highways England consider that this matter is adequately</p>
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	<p>adjacent properties.</p> <p>The approved scheme shall be implemented prior to first use of the lighting and be permanently maintained in that state thereafter.</p>			<p>addressed in existing DCO Requirements.</p> <p>Item MW-G29 of the OEMP provides a number of requirements for site lighting, including the avoidance of disturbance of nearby residents.</p> <p>These will be reflected in the CEMP which must be prepared in accordance with the OEMP (as per item MW-G5 of the OEMP) in consultation with Wiltshire Council. Compliance with the OEMP is secured pursuant to requirement 4 of Schedule 2 of the DCO [APP-020].</p> <p>In respect of both (a) and (b) the Applicant considers that the inclusion of the proposed requirement would duplicate controls already in place in the OEMP, secured through requirement 4 and so the proposed requirement would be unnecessary.</p>
<p>B1.16</p>	<p>Private Water Supplies</p>	<p>To protect existing local private water supplies to</p>		<p>(a) The Applicant has prepared an update to the</p>

					<p>include means of pollution control.</p> <p>On this basis, the Applicant considers that requirement 10 adequately addresses the underlying concern that the proposed requirement seeks to address, and its inclusion would unnecessarily duplicate the controls in requirement 10.</p>
B1.17	<p>Land Contamination</p> <p>In the event of any contaminated material, including impacted groundwater being found during the course of the construction of the authorised development that was not previously identified, the undertaker shall cease construction in the vicinity of the contamination and immediately report it in writing to the Secretary of State, the Environment Agency and the Local Planning Authority. Development on the part of the site affected shall be suspended and a risk</p>		X		<p>This proposed requirement broadly follows requirement 7 in Schedule 2 of the draft DCO. It differs in that it requires the cessation of works on the discovery of contaminated land or groundwater not previously identified, which are only to be resumed following the carrying out of remedial measures.</p> <p>The Applicant considers that a requirement addressing risks arising from previously unidentified contaminated land or groundwater to be appropriate, which is why it included requirement 7 in its draft DCO. However, the form in which this proposed</p>

	<p>assessment shall be carried out.</p> <p>Where the undertaker determines that remediation is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be prepared, submitted to and approved in writing by the Secretary of State following consultation with the Environment Agency and the local planning authority.</p> <p>Remedial measures must be carried out in accordance with the approved scheme.</p> <p>These approved schemes shall be carried out before the development [or relevant phase of development] is resumed or continued.</p>			<p>requirement is drafted is, in the Applicant's view, not reasonable in all other respects and would therefore fail the tests in paragraph 4.9 of the National Policy Statement for National Networks.</p> <p>The Applicant considers the requirement to be unreasonable because it prescribes a single solution for all circumstances where previously undiscovered contaminated land is discovered which may not always be the appropriate course of action; the immediate cessation of works until remediation is complete.</p> <p>The Applicant's preferred form of the requirement, included in the draft DCO, is more proportionate. It requires the previously unidentified contaminated land or groundwater to be reported as soon as reasonably practicable to the planning</p>
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				<p>authority and the Environment Agency and requires the undertaker to carry out a risk assessment, in consultation with the planning authority and the Environment Agency. This would enable works to continue, where the risks of doing so are acceptable and the Applicant would be required to consider the views of both Wiltshire Council and the Environment Agency when assessing those risks.</p> <p>Where the Applicant considers remediation of the contaminated land is necessary, it is required to prepare a written scheme and programme for the remedial measures to be taken, which must be approved in writing by the Secretary of State following consultation with the planning authority and the Environment Agency.</p> <p>Taken together, Wiltshire Council and the Environment Agency would be given every opportunity for their views to</p>
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					be considered by the Applicant in (i) the assessment of risk posed by the previously unidentified contaminated land and (ii) the appropriate measures to be taken to remediate it, if necessary.
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Ref.	Flood Risk and Drainage		Requirement Discharged by:		Highways England's Response
	Requirement	Reason	Secretary of State	Wiltshire Council	
B1.18	<p>Detailed design</p> <p>(1) The authorised development must be designed in detail and carried out so that it is compatible with the works plans, the engineering section drawings (plan and profiles} and the engineering section drawings (cross sections} unless otherwise agreed in writing by the Secretary of State following consultation with the planning authority, the local highway authority and LLFA on matters related to its</p>	<p>To ensure that the development can be adequately drained without increasing flood risk to others.</p>	X		<p>The proposed requirement follows the wording in requirement 3 of Schedule 2 of the draft DCO, save that it adds the words "the local highway authority and LLFA on matters related to its functions".</p> <p>The Applicant considers the inclusion of those words to be unnecessary. Article 2(1) of the DCO defines "planning authority" as meaning "the local planning authority for the land and matter in question,</p>

	<p>functions and provided that the Secretary of State is satisfied that any amendments to the works plans, the engineering section drawings (plan and profiles) and the engineering section drawings (cross sections) would not give rise to any materially new or materially worse adverse environmental effects in comparison with those reported in the environmental statement.</p> <p>(2) Where amended details are approved by the Secretary of State under sub-paragraph (1), those details are deemed to be substituted for the corresponding works plans, engineering section drawings (plan and profiles) or engineering section drawings (cross sections) and the undertaker must make those amended details available in electronic form for inspection by members of the public.</p>				<p>being Wiltshire Council;". This definition is inclusive of Wiltshire Council's relevant functions as planning authority, highway authority, traffic regulation authority, street authority, lead local flood authority etc.</p>
<p>B1.19</p>	<p>Details of consultation</p>	<p>To ensure that the development can be</p>	<p>X</p>		<p>The Applicant in its revision 2 DCO for submission for</p>

	<p>(1} With respect to any requirement which requires details to be submitted to the Secretary of State for approval under this Schedule following consultation with another party, the details submitted must be accompanied by a summary report setting out the consultation undertaken by the undertaker to inform the details submitted and the undertaker's response to that consultation.</p> <p>(2} At the time of submission to the Secretary of State for approval, the undertaker must provide a copy of the summary report referred to under subparagraph (1} to the relevant consultees referred to in the requirement in relation to which approval is being sought from the Secretary of State.</p> <p>(3} The undertaker must ensure that any consultation responses are reflected in the details submitted to the Secretary of State for approval under this Schedule, but only where it is appropriate, reasonable and</p>	<p>adequately drained without increasing flood risk to others.</p>		<p>deadline 3 has included an additional paragraph in Schedule 2 that addresses the underlying concern through a similarly worded paragraph. The new paragraph requires the submission of a summary consultation report alongside an application for the Secretary of State's approval of details under a requirement, summarising the consultation undertaken pursuant to that requirement to inform the details submitted. If the consultation responses are not reflected in the details submitted, the summary consultation report must state the Applicant's reasons for not including them.</p> <p>The Applicant considers that its preferred wording is a proportionate means of meeting the underlying objective of the proposed requirement.</p>
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	<p>feasible to do so, taking into account considerations including, but not limited to, cost and engineering practicality.</p> <p>(4} Where the consultation responses are not reflected in the details submitted to the Secretary of State for approval, the undertaker must state in the summary report referred to under sub-paragraph (1} the reasons why the consultation responses have not been reflected in the submitted details.</p>				
B1.20	<p>Construction Environmental Management Plan</p> <p>(1} No part of the authorised development is prepared in consultation with the relevant planning authority, the local highway authority and the LLFA and submitted to and approved in writing by the Secretary of State.</p> <p>(2} The CEMP must be substantially in accordance with the Outline Environmental Management Plan.</p>	<p>To ensure that the development can be adequately drained without increasing flood risk to others.</p>	X		<p>Each of the four limbs to the proposed requirement are already adequately addressed in the OEMP, compliance with which is secured by requirement 4. It is therefore unnecessary to duplicate that control through the inclusion of the proposed requirement:</p> <p>(1) The Applicant understands that this is intended to be a pre-commencement requirement to consult with</p>

	<p>(3} The authorised development must be constructed in accordance with the approved CEMP.</p> <p>(4} Upon completion of construction of the authorised development the CEMP must be converted into the HEMP and the authorised development must be operated and maintained in accordance with the HEMP.</p>			<p>Wiltshire Council on the preparation of a CEMP. It is unnecessary to include this as a requirement as the OEMP, ref MW-G5, already requires consultation with Wiltshire Council on the preparation of CEMPs. Compliance with the OEMP is secured by requirement 4.</p> <p>(2) The requirement for CEMPs to accord with the OEMP is embedded throughout the OEMP. Compliance with the OEMP is secured by requirement 4.</p> <p>(3) Requirement 4 requires the authorised development to be carried out in accordance with the OEMP. It is the OEMP that gives rise to the need to prepare and comply with CEMPS and the other subsidiary documents that are required to be produced under it. Requirement 4 of the draft DCO is appropriately drafted in this respect.</p>
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					(4) The obligation to prepare HEMPs is set out in the OEMP (ref MW-G11).
B1.21	<p>Groundwater</p> <p>(1} Subject to sub-paragraph (2}, the authorised development must be carried out in accordance with the flood risk assessment, including the mitigation measures detailed in it, so that no part of the authorised development is predicted to result in any exceedance of the flood levels to properties and land shown in the flood risk assessment.</p> <p>(2} Sub-paragraph (1} does not apply in any circumstance where the undertaker proposes to carry out a part of the authorised development otherwise than in accordance with the flood risk assessment and either demonstrates to the LLFA's satisfaction that the part of the authorised development concerned would not result in an exceedance of the flood</p>	To ensure that the development can be adequately drained without increasing flood risk to others.	X		<p>A flood risk assessment has been carried out for the Scheme, see Appendix 11.5 of the Environmental Statement [APP-283] which concludes that during operation the flood risk from all sources of flooding to receptors is low or negligible. In respect of the drainage system for the Scheme, requirement 10 in Part 1 of Schedule 2 to revision 1 of the draft DCO [REP2-003] ensures that no part of the Scheme is commenced until the Secretary of State, following consultation with Wiltshire Council in relation to its land drainage functions, and the Environment Agency, has approved the drainage system for that part. The drainage system must be based on the mitigation measures included in the Environmental Statement.</p>

	<p>levels shown in the flood risk assessment or demonstrates that all affected landowners accept the predicted exceedance of the flood levels shown in the flood risk assessment.</p> <p>(3} The flood risk assessment shall include an allowance for climate change consistent with the river and surface water flood risk assessments.</p> <p>(4} Groundwater monitoring to be undertaken during a baseline period, construction and for a minimum of 5 years post construction.</p>	<p>This information will be invaluable to confirm that the design is functioning as</p>		<p>The OEMP includes obligations that go beyond those envisaged by the proposed requirement. These include an obligation to prepare a Flood Risk Management Plan in consultation with the Environment Agency (MW-WAT12) and obliges the main works contractor to ensure that all design does not cause increased risk level from those assessed in the Flood Risk Assessment. MW-WAT10 requires the preparation of Scheme-wide Groundwater Management Plan to, amongst other matters, develop baseline groundwater conditions and derivation of trigger levels and action levels/mitigation/action plans for exceedances and accidents/incidents. Additionally, MW-WAT15 requires, where changes in groundwater levels are predicted to occur as a result of construction activity which would be considered</p>
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		intended and any required mitigation works.			<p>significant, using the methodology set out in the groundwater management plan</p> <p>The Applicant considers therefore, that requirement 10 and the OEMP, compliance with which is secured by requirement 4, appropriately addresses the underlying concern of ensuring that flood risk is appropriately mitigated.</p>
B1.22	<p>Surface water / road drainage and flood risk</p> <p>(1} Subject to sub-paragraph (2}, the authorised development must be carried out in accordance with the flood risk assessment, including the mitigation measures detailed in it, so that no part of the authorised development is predicted to result in any exceedance of the flood levels to properties and land shown in the flood risk assessment.</p> <p>(2} Sub-paragraph (1} does not apply in any circumstance</p>	To ensure that the development can be adequately drained without increasing flood risk to others.	X		<p>A flood risk assessment has been carried out for the Scheme, (see Appendix 11.5 of the Environmental Statement [APP-283]) which concludes that during operation the flood risk from all sources of flooding to receptors is low or negligible. This assessment included an allowance for climate change in the assessment of the proposed scheme (see paragraph 3.4.3 of APP-283). The assessment also provided a full consideration of the groundwater flood risk</p>

	<p>where the undertaker proposes to carry out a part of the authorised development otherwise than in accordance with the flood risk assessment and either demonstrates to the LLFA's satisfaction that the part of the authorised development concerned would not result in an exceedance of the flood levels shown in the flood risk assessment or demonstrates that all affected landowners accept the predicted exceedance of the flood levels shown in the flood risk assessment.</p> <p>(3} Road drainage will be designed to;</p> <p>(a} Control peak discharge rates and provide appropriate attenuation storage within the system for a 1 in 100 year return period;</p> <p>(b} Allow for climate change in accordance with Environment Agency guidance and the Design Manual for Roads and Bridges;</p>			<p>baseline environment (see section 6.4 of APP-283).</p> <p>In respect of the drainage system for the Scheme, requirement 10 in Part 1 of Schedule 2 to revision 1 of the draft DCO [REP2-003] ensures that no part of the Scheme is commenced until the Secretary of State, following consultation with Wiltshire Council in relation to its land drainage functions, and the Environment Agency, has approved the drainage system for that part. The drainage system must be based on the mitigation measures included in the Environmental Statement.</p> <p>Requirement 10 as drafted ensures that the drainage system for the Scheme is appropriate and is based on the Flood Risk Assessment which is contained in the Environmental Statement.</p>
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	<p>(c) Ensure that flows resulting from rainfall in excess of a 1 in 100 year rainfall event are managed in exceedance routes that minimise the risks to people and property.</p> <p>(d) Enable automated control of the tunnel drainage.</p> <p>(4) Surface water drainage will be designed to;</p> <p>(a) Convey the 1 in 30 year rainfall event without causing flooding to any part of the site;</p> <p>(b) Manage the 1 in 100 year rainfall event within the site without causing flooding to any building (including a basement) or in any utility plant susceptible to water (e.g. pumping station or electricity substation);</p> <p>(c) Manage flows from rainfall in excess of the 1 in 100 year rainfall event in routes that minimises the risks to people and property;</p>			<p>In respect of paragraph (5), which relates to the construction of the tunnel and groundwater, please see the Applicant's comments on Wiltshire Council's response to the Examining Authority's first written questions, reference DCO.1.7, submitted at deadline 3. In summary, the Applicant has committed, through the OEMP [APP-187], to a tunnelling method that minimises the need for dewatering (reference MW-WAT8) and should the limited amount of dewatering that could be required exceed the exemption thresholds, an abstraction licence would be sought from the Environment Agency under Section 24 Water Resources Act 1991. The Applicant considers the imposition of proposed paragraph (5) to be unnecessary as it would duplicate existing statutory regimes, contrary to paragraph 4.50 of the National Policy</p>
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	<p>(d} Allow for climate change in accordance with Environment Agency guidance.</p> <p>(5}The tunnel will be constructed almost entirely through chalk, which acts like a large underground reservoir in this location. In order to mitigate the flood risks that dewatering could introduce in an area with past flooding issues, we propose that the applicant specify a tunnel construction method that minimises the need for dewatering. Furthermore, any dewatering method must have the facility to be stopped during periods of high rainfall or flood risk and have a full risk assessment approved by the Environment Agency and Wiltshire Council.</p> <p>(6} No part of the authorised development is to commence until written details of the drainage system to be constructed for that part, based on the mitigation measures included in the Environmental Statement, and including means</p>			<p>Statement for National Networks.</p> <p>The Applicant considers that requirement 10 as drafted in Revision 1 of the draft DCO [REP2-003] is an appropriate mechanism to ensure that road drainage for the Scheme avoids giving rise to a surface water flood risk and that the additional stipulations included in the proposed requirement are unnecessary.</p>
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	<p>of flood risk and pollution control, have been submitted to and approved in writing by the Secretary of State, following consultation with the Local Planning Authority, the local highway authority and the LLFA.</p> <p>(7} The drainage system must be constructed in accordance with the approved details referred to in sub- paragraph (5} unless otherwise agreed in writing by the Secretary of State following consultation with the Local Planning Authority, the local highway authority and the LLFA.</p> <p>(8} The drainage system must be designed and constructed in accordance with local and national planning legislation and technical guidance.</p>				
<p>B1.23</p>	<p>Telemetry Installed telemetry to be left in situ to enable the Environment Agency and Wiltshire Council to better understand local flood risk and the impacts of the authorised development. The</p>	<p>To enable the Environment Agency and Wiltshire council to better understand the flood risk and inform the flood warning service.</p>	<p>X</p>		<p>The proposed requirement seems intended to require the Applicant to provide apparatus to supplement the Environment Agency and/or Wiltshire Council's statutory functions. The Applicant notes</p>

	<p>telemetry would need to be installed and calibrated to match the Environment Agency's standards. The Installed telemetry to be funded by a maintenance agreement or alternatively Highways England to permit the Installed telemetry to be adopted by the Environment Agency subject to the Environment Agency's agreement.</p>				<p>that detailed information on the Scheme's impacts to flood risk are contained in the Flood Risk Assessment [APP-283]. The OEMP, [APP-187] includes provisions to regulate flood risk and monitor water resources, including groundwater (see MW-WAT15 in particular).</p> <p>Notwithstanding this important matter, the telemetry referred to is outside of the order limits on land subject to temporary licences granted by the landowners and so may not be deliverable in any event.</p> <p>As such, the Applicant considers that the proposed requirement does not meet the tests for the imposition of requirements set out in paragraph 4.9 of the National Policy Statement for National Networks in that it is not necessary to make the Scheme acceptable in planning terms.</p>
B1.24	Warn and inform	To improve Wiltshire Council's understanding of	X		The proposed pre-commencement requirement

	<p>Prior to commencement of the authorised development, in consultation with Wiltshire Council / Environment Agency, Highways England shall investigate how the groundwater and fluvial modelling / monitoring will help to 'warn and inform' parishes within the catchment, by setting appropriate thresholds and triggers for all sources of water within communities that may be affected by the implementation of the Scheme. The findings shall be made available to Wiltshire Council annually, and the final report made available within 3 months of the post construction monitoring period (minimum of 5 years) ending.</p>	<p>flood risk and warning systems.</p>		<p>appears intended to require the Applicant to supplement Wiltshire Council's functions.</p> <p>The Applicant notes that detailed information on the Scheme's impacts to flood risk are contained in the Flood Risk Assessment [APP-283]. The OEMP, [APP-187] includes provisions to regulate flood risk and monitor water resources, including groundwater (see MW-WAT15 in particular).</p> <p>In the Applicant's view the proposed requirement will fail the tests for requirements set out in paragraph 4.9 of the National Policy Statement for National Networks in that it is not necessary to make the development acceptable in planning terms and is not reasonable in all other respects.</p> <p>The Applicant is prepared to share the results of modelling but remains of the view it is not appropriate to impose a requirement to achieve this.</p>
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<p>B1.25</p>	<p>Drainage engineer</p> <p>Upon commencement of the authorised development, Highways England shall provide funding to Wiltshire Council to appoint a suitably qualified drainage engineer up to the completion of the authorised development to investigate and monitor flood risk within the catchment of the Scheme. This is to enable Wiltshire Council to perform their statutory duties as LLFA under the Flood and Water Management Act 2010.</p>	<p>To ensure adequate resources to fulfil our duties in respect of the DCO.</p>	<p>X</p>	<p>The reason given for the proposed requirement expressly acknowledges that it is required in order for Wiltshire Council to fulfil its statutory duties.</p> <p>In the Applicant's view the proposed requirement will fail the tests for requirements set out in paragraph 4.9 of the National Policy Statement for National Networks in that it does not necessary to make the authorised development acceptable in planning terms and is not reasonable in all other respects.</p> <p>The Applicant will continue discussions with Wiltshire Council in respect of the protective provisions for the benefit of drainage authorities.</p>
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Appendix C: Consolidated list of suggested development consent obligations

Ref.	Archaeology and World Heritage Site Considerations	Highways England's Response
C1.01	<ol style="list-style-type: none"> <li data-bbox="353 427 1155 608">1 The cost of the monitoring of the archaeology mitigation requirements, which are essential to the Scheme being acceptable, should be included in the agreement so the costs are covered by Highways England. We have estimated these at £60,000. <li data-bbox="353 663 1128 770">2 Legacy and benefits projects which relate to the WHS and have been agreed should be included in the agreement. 	<ol style="list-style-type: none"> <li data-bbox="1182 427 2011 791">1 The Applicant considers that the proposed development consent obligation would fail to meet the tests in paragraph 4.10 of the National Policy Statement for National Networks in that the obligation is not necessary to make the development acceptable in planning terms.] However, the Applicant is in discussions with Wiltshire Council in relation to a planning performance agreement that would assist the Council with the costs arising from monitoring archaeological mitigation. <li data-bbox="1182 847 2011 1291">2 The legacy benefits that relate to the WHS referred to in this proposed development consent obligation have been included in Appendix F of the draft Detailed Archaeological Mitigation Strategy [REP2-038]. Compliance with the DAMS is secured through requirement 5 of the draft DCO [REP2-003]. The DAMS would be approved by the Secretary of State when making the DCO, if the Applicant's application is approved. In the Applicant's view the proposed development consent obligation is not necessary to make the development acceptable in planning terms as the proposed measure is already secured.

Ref.	Impact of the A303 Amesbury to Berwick Down dualling scheme on Local Transport	Highways England's Response
C1.02	<p>1. Detrunked sections of A303 to be transferred to WC for future maintenance with undertakings that:</p> <ul style="list-style-type: none"> • HE and WC will undertake a joint condition survey when Scheme works have been completed. All assets, including lighting, drainage, carriageway and footway construction and surface finish, structures, signs, lines and markings to be included in survey. • All identified items requiring maintenance interventions will be remediated by HE, at their cost, or addressed by way of the payment by HE of an agreed commuted sum. • Requirement for maintenance intervention will be deemed to be items where less than • [5] years maintenance free life expectancy is identified by WC. <p>2. Any Traffic Regulation Orders required in relation to new works (cycle provision, traffic calming etc.) to the de-trunked road through Winterbourne Stoke, or any other locations subsequently identified as requiring intervention as an unforeseen consequence of the Scheme to be at the cost of HE.</p> <p>3. HE to be responsible for maintenance of all diversion signage required on the local road network in relation to both the tunnel closure and the high vehicle diversion routes.</p>	<p>The Applicant considers that these matters do not meet the tests in paragraph 4.10 of the National Policy Statement for National Networks in that they relate to the regulation of matters as between two highway authorities rather than relating to the acceptability, in planning terms, of the authorised development. Nonetheless, the Applicant acknowledges the need for agreement to be reached on these matters and the Applicant and Wiltshire Council are negotiating the terms of a legal agreement. The intention of the parties is for this agreement to be concluded prior to the close of the examination.</p>

<p>4. HE to be responsible for the operation and future maintenance and operational costs of the traffic signals controls at Countess and Longbarrow roundabout junctions.</p> <p>5. New roads to be transferred between HE and WC (e.g. the A360 Longbarrow junction links}, to be have future maintenance boundaries agreed between the parties in the form of [a set of] coloured plans before vesting time, as set out in CI 9(1-5} of the Draft DCO.</p> <p>6. New street lighting and lighting to new signage to be maintained by the local highway authority to be subject to handover notes relating to specification, energy supply and controls [Atkins].</p> <p>7. All those parts of the Scheme to be subject to CI 9(1-5} of the Draft DCO shall provide for:</p> <ul style="list-style-type: none"> • Provision of handover notes • As constructed details (including topographical survey and details from specialist suppliers} • H&S files • All certificates and warranties in respect of the works • Copies of statutory approvals, waivers, consents and conditions • Equipment test certificates 	
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Ref.	Flood Risk and Drainage	Highways England's Response
C1.03	<p>Highways England to fund / enable community volunteers (flood wardens) during the lifetime of the Scheme from now to post-construction to monitor watercourses within their communities, so they would have ownership and a greater understanding of their flood risk</p>	<p>The Applicant considers that this proposed development consent obligation would fail to meet the tests in paragraph 4.10 of the National Policy Statement for National Networks in that it (i) not necessary to make the development acceptable in planning terms as the Flood Risk Assessment for the Scheme predicts a Low or negligible flood risk during operation (ii) is not directly related to the authorised development and (iii) and is not fairly and reasonably related in scale and kind to the authorised development.</p> <p>Additionally, its terms are imprecise in that it does not specify a duration for which the Applicant is proposed to fund or enable community flood wardens.</p> <p>The Applicant is willing to support the Council administratively with the proposed community initiative, but for the reasons stated above, it would not be appropriate to do so by way of a development consent obligation.</p>

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