

Our ref: Deadline 3 Your ref: TR010025

Mr Richard Price National Infrastructure Case Manager Major Applications and Plans The Planning Inspectorate Temple Quay House Temple Quay Bristol BS1 6PN Derek Parody A303 Stonehenge Project Director Highways England Temple Quay House 2 The Square Temple Quay Bristol BS1 6HA

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31 May 2019

Dear Mr Price,

#### A303 Amesbury to Berwick Down Application for Development Consent – Deadline 3 Submission

Further to the Rule 8 letter dated 11 April please find enclosed the following documents set out in the order shown in item 12 of Annex A of that letter:

# *Written summaries of oral submissions put at Open Floor Hearings held on 22 and 23 May 2019*

Please find enclosed.

## An updated version of the draft Development Consent Order (dDCO) [REP2-003]

Please find enclosed both a clean and track changed versions of this document, together with a document explaining the changes to the dDCO submitted at Deadline 2.

# An updated Mitigation Schedule referred to as a 'Consolidated Environmental Mitigation Schedule' [REP2-039]

Please find enclosed. This document has been restructured to demonstrate how the mitigation measures identified within the Environmental Statement (ES) and additional mitigation measures that have been agreed through the Examination process to Deadline 3 are secured. Due to this restructuring it is not practicable to provide a tracked version as the changes are numerous and varied.

## Comments on WRs (including WRs to Deadline 2a) and responses to comments on RRs

Please find enclosed a document which comments on the Written Representations received (including WRs at Deadline 2a).

Highways England has reviewed the comments on Relevant Representations; received by Barry Garwood [REP2-209], Gillian Anlezark on behalf of COGS [REP2-152] and Wiltshire Council [REP2-047]. We have no additional comments on the matters raised that are not

otherwise addressed in our previous submissions, those that are being submitted as part of Deadline 3 and that will be addressed during forthcoming hearings.

## Comments on Local Impact Report(s)

Please find attached two documents which comment on Local Impact Reports prepared by Wiltshire County Council [REP1-057] and Devon County Council [REP1-060].

#### Comments on responses to the ExA's Written Questions

Please find enclosed this document.

#### An updated version of the Guide to the Application

Please find enclosed this document, which has been updated for Deadline 3.

# An updated version of the Land Acquisition and Temporary Possession Negotiations Schedule

Please find enclosed a clean and tracked document, which has been updated from Deadline 2 [REP2-041].

## Progressed Statements of Common Ground

The paragraphs below provide the Examining Authority with an update on the statements of common ground ("SOCG") issued at Deadline 2.

#### Wiltshire Council

Regular discussions continue with Wiltshire Council on a range of matters. With specific regard to the SOCG, meetings with Council Officers as a group were held on 14 and 28 May, and a meeting focussed on ground water and flooding was held on 17 May. A draft Highways Agreement is in discussion between Highways England and Wiltshire Council. Once the content and wording of this document is agreed a number of items within the SOCG will move to agreed. The updated Outline Environmental Management Plan ("OEMP"), included with this letter, is designed to address a number of matters and this will be confirmed once Wiltshire Council has had the opportunity to review this document.

#### **National Trust**

A number of the matters within the 'under discussion' table relate to the OEMP, of which an updated version has been submitted at Deadline 3. These matters will be progressed once the National Trust has had the opportunity to review this document.

#### Historic Buildings and Monuments Commission for England (Historic England)

Subsequent to deadline 2, meetings have been held on 15 and 28 May specifically to discuss matters within the SOCG. The SOCG will continue to be structured thematically as already set out in the draft document submitted at Deadline 2 and will be updated with reference to Historic England's Written Representations on the same themes highlighted in their Relevant Representations. This will assist read across. Discussion is ongoing and meetings are being scheduled in order to allow more detailed discussion on those matters which the SOCG identifies remain 'under discussion'. Highways England has updated the OEMP which is

designed to address a number of these outstanding matters and further meetings will be held with Historic England to progress discussion once they have had the opportunity to review this document.

## English Heritage Trust

Discussions continue with English Heritage Trust and, specifically in respect of the SOCG, a meeting was held to review matters on 28 May. Matters under discussion fall largely into six areas:

- NMU routes within the WHS, particularly the potential route between the Longbarrow junction and Airman's Corner and, if included, its location and design;
- arrangements for consultation with English Heritage Trust during the development of detailed design;
- proposed restrictions on future excavation over the line of the tunnel;
- signage for the Visitor Centre, in construction and operation;
- the continued ability of motorised users to travel on byways 11 and 12; and
- potential impacts during construction.

The SOCG is to be re-structured to group items by the areas identified above. The updated OEMP is designed to address a number of matters and this will be confirmed once English Heritage Trust has had the opportunity to review this document.

## **National Farmers Union**

Highways England are seeking to progress SOCG discussion further with the NFU, a date for the next meeting has yet to be confirmed.

## **Environment Agency**

Highways England continues to discuss with the Environment Agency the five matters not yet agreed, as noted in the SOCG [REP2-012] submitted at Deadline 2 . A meeting is scheduled for 3 June to address the three items relating to flood risk.

## Natural England

Discussions are ongoing with Natural England.

## The Royal Society for the Protection of Birds

Conversations are ongoing with regard to the three matters identified as under discussion within the SOCG submitted at Deadline 2. These have not yet progressed to a point where the SOCG can be updated.

## Winterbourne Stoke Parish Council

Within matters under discussion Winterbourne Stoke Parish Council has raised a number of concerns with regard to the potential effects of radon. In seeking to address these Highways England has passed the Parish Council a report titled *Radiological assessment of tunnel arisings from A303 Amesbury to Berwick Down Stonehenge bypass* prepared by Public Health England, issued to the Examination at Deadline 2. A meeting has been set for 20 June 2019 to discuss the report, and the SOCG in general.



# The Trail Riders Fellowship

The Trail Riders Fellowship (TRF) and Highways England have been working together in the preparation of a SOCG. However, Highways England understands that TRF has decided to prepare a further representation to the Examination, which is likely to be submitted at Deadline 3, rather than agreeing to the draft SOCG as its stands, at the present time.

Highways England will continue working with TRF in respect of the preparation of a draft SOCG.

## Any further information requested by the ExA under Rule 17 of the Exam Rules

## Hydrogeological Reports and Flood Risk Assessment

Please find enclosed the Level 3 - Flood Risk Assessment (FRA) and four further Hydrogeological Reports (listed below):

- Stonehenge Area Pumping Test 2018, Interpretative Report
- Implications of 2018 Ground Investigations to the Groundwater Risk Assessment
- Groundwater Monitoring 2018-19, Conceptual Model Review
- Supplementary Groundwater Model Runs to Annex 1 Numerical Model Report

Highways England has incorporated Environment Agency and Wiltshire Council comments in updating these documents. These four hydrogeological reports supersede the draft reports that were submitted to the Examining Authority on 5 April 2019 [AS-016, AS-017, AS-018, AS-019]. Tracked versions have only been provided for those documents which have been changed.

#### **Photomontages**

In response to the Examining Authority's first Written Questions and requests for information (ExQ1) issued on 11 April 2019 and Question LV.1.9 Highways England has included at Deadline 3 the following photomontages, which are individually provided in pdf format:

- *Figure 7.69* Viewpoint 9 View north-west from PRoW (footpath WST011) response to Examining Authority Question LV.1.9 (ii)
- Figure 7.70 Viewpoint 28 View south-west from WHS interpretation panel viewpoint located in access land approximately 100m west of Woodhenge monument, response to Examining Authority Question LV.1.9 (ii)
- *Figure 7.71* View north-west from the Lord's Walk footpath alongside the River Avon in the north of Amesbury, response to Examining Authority Question LV.1.9 (ii)
- Figure 7.72 Viewpoint 9 View north-west from PRoW (footpath WST011), response to Examining Authority Question LV.1.9 (iii)
- *Figure 7.73* Viewpoint 13 View south-west from the Stonehenge, Avebury and Associated Sites World Heritage Site interpretation panel viewpoint located at the northern end of the Winterbourne Stoke Group, response to Examining Authority Question LV.1.9 (iii)
- Figure 7.74 Viewpoint IV View from the high point (the tumulus) to the south of VP6, looking south-east, response to Examining Authority Question LV.1.9 (iv)
- *Figure 7.75* Viewpoint V looking northwards towards the B3083 from a position south of the proposed A303 bypass, taking in Green Bridge 1 and the B3083 underbridge, response to Examining Authority Question LV.1.9 (v)
- Figure 7.76 Viewpoint XII from the junction of the tracks to the east of Half Moon Clump, looking southwards, response to Examining Authority Question LV.1.9 (xii)



- Figure 7.77 Viewpoint Xiii from the tumulus by the radio antennae to the north east of Countess roundabout, response to Examining Authority Question LV.1.9 (xiii)
- Figure 7.78 Viewpoint Xiv from location CH23 (Cultural Heritage Setting Assessment APP-218), response to Examining Authority Question LV.1.9 (xiv)
- Figure 7.79 Viewpoint Xvi from the northern part of Amesbury Conservation Area towards Countess roundabout, response to Examining Authority Question LV.1.9 (xvi)

The CGI 360 degree visualisations' (the "visualisations") will unfortunately not be ready for Deadline 3. In the interim, the Examining Authority should refer to the photomontage locations which they already have within the ES landscape and visual impact assessment, since they are from the same locations as the visualisations. There are only a few locations in which aspects of the Scheme would be visible in the visualisations but not in the photomontages, as in the majority of instances, the visualisations cover parts of the landscape which the Scheme does not cross.

The CGIs are not available for Deadline 3 due to the modelling requirements taking longer than expected, as a result of a lack of existing information upon which to base the modelling. Highways England expects to have resolved these issues in order to submit the visualisations at Deadline 4.

## **Arboricultural Drawings**

In response to the Examining Authority First Round of Written Questions, the following Arboricultural drawings are included in respect of questions LV.1.31 and LV.1.34:

- HE551506-AMW-GEN-SW-DR-LA-0001 to 0006 rev02
- HE551506-AMW-GEN-SW-DR-LA-0007 to 0051 rev02
- HE551506-AMW-GEN-SW-DR-LA-0052 to 0057 rev04
- HE551506-AMW-GEN-SW-DR-LA-0058 to 0102 rev02
- HE551506-AMW-GEN-SW-DR-LA-0103 to 0105 rev01

As an update to question LV.1.31, drawings within Appendix 10, Figure 7A Trees to be Removed or Impacted (drawing numbers: HE551506-AMS-GEN-SW-DR-LA-103 to 105 Rev 01) have been provided to illustrate those trees which are protected by a statutory designation (Ref: HE551506-AMS-GEN-SW-DR-LA-103 to 105 Rev 01) and are likely to be removed to facilitate the Scheme due to being in the direct footprint of the works. These plans also include an insert schedule of affected trees classified by their quality category. The trees that are likely to be removed and which are covered by a statutory designation are:

- three Category B (moderate quality) trees and part of two Category B tree groups, 11 Category C trees (low quality), four full tree groups and part of two groups within Amesbury Conservation Area; and
- a tree group assigned to Category C (G296), which is located within a designated Site of Special Scientific Interest (SSSI) at Rollestone Corner .

These above trees were not identified within the Arboricultural Impact Assessment [APP-230] and therefore were omitted from the Applicant's earlier response.

As an update to question LV.1.34, following a further review of the Arboricultural Impact Assessment [APP-230], the Applicant has identified a low number of additional trees which are likely to require removal to facilitate the Scheme and accounting for the Limits of Deviation due



to being within the direct footprint of the works. These additional trees are detailed in the table below.

Tree Reference	BS 5837 Category	Statutory Designation	Tree Works to Facilitate Development
G22	В		Fell
G296	С	SSSI	Fell
G874	С		Fell in part
G1002	С		Fell
T1004	С		Fell
T1005	С		Fell
T1006	С		Fell
T1007	С		Fell
G1012	В		Fell
G1019	С		Fell
W1098	В		Fell in part

None of these trees are classified as being of high quality, none are of veteran status or are protected by a Tree Preservation Order or Conservation Area designation. One low value tree group is located within a Site of Special Scientific Interest adjacent to Rollestone Corner (the removal of trees within this group will require the consent of Natural England if other powers or consents are not in place). These trees do not provide any visual screening for the purposes of the landscape and visual impact assessment [APP-045] undertaken and therefore their removal would not alter its conclusions. The proposed scheme will require the full removal 191 tree features and the partial removal of 15 tree groups. This includes four Category U (unsuitable for retention) trees due to a conflict with the footprint of the Proposed Scheme.

No high quality trees are to be removed or are at risk of removal. Of the trees to be removed in full, 45 are of moderate quality (Category B) and142 are of low quality (Category C). Of the tree groups to be removed in part, six are of moderate quality and nine are of low quality. The Tree Removals Plan from Annex 7.10.3 (Ref: HE551506-AMW-GEN-SW-DR-LA-0058 to 0102 Rev 02) has been updated to reflect these changes.

## **Archaeological Reports**

Please find enclosed two Further Archaeological Reports:

- Archaeological Evaluation Review of Ploughzone Artefact and Tree Hollow Distributions.
- o Palaeoenvironmental Assessment Western Portal and Approaches.

These documents incorporate the comments of the Heritage Monitoring Advisory Group ("HMAG").

#### **Outline Environmental Management Plan**

As promised in Deadline 2 submissions, please find enclosed a clean and tracked updated Outline Environmental Management Plan ("OEMP"). This document updates the OEMP that

was submitted as an appendix of the Environmental Statement – (6.3 Environmental Statement Appendix 2.2) [App-187].

#### **Protective Provisions Update**

In answer to DCO.1.108 and 109 in First Written Questions, Highways England said it would provide an update on progress of negotiation of protective provisions. Please find an enclosed document detailing this.

#### **Accompanied Site Inspection Queries**

Highways England were asked to confirm the purpose of a staff gauge placed by Highways England adjacent to water monitoring borehole number 10 at Blick Mead. Highways England can confirm the following in this respect:

The staff gauge is for monitoring water levels if they reach the surface at this location. It was installed adjacent to a borehole so as to have two separate measurements; one below ground and one at surface. From this Highways England can verify whether water at surface is as a result of groundwater levels being so high that they are above ground level (as in the conceptual model) or whether there is a separate source of surface water whilst the groundwater is confined below surface.

Highways England were further asked to confirm the status of Grey Bridge, Amesbury as a designated heritage asset:

Highways England can confirm that the structure is recorded National Heritage List for England list entry number 1131054, listed Grade II.

I would be grateful if you could acknowledge safe receipt of this letter and enclosed documents.

Yours sincerely

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