

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

**Wiltshire Council (A303-AFP022) Response  
to Written Representations**

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## 1. Glossary of Terms

<b>APC</b>	Amesbury Property Company
<b>BHLL</b>	Beacon Hill Land Limited
<b>BOAT</b>	Byway Open to All Traffic
<b>CEMP</b>	Construction Environmental Management Plan
<b>DCO</b>	Development Consent Order
<b>DfT</b>	Department for Transport
<b>EA</b>	Environment Agency
<b>ExA</b>	Examining Authority
<b>HE</b>	Highways England
<b>HEMP</b>	Handover Environmental Management Plan
<b>HGV</b>	Heavy Goods Vehicle
<b>LEMP</b>	Landscape and Ecological Management Plan
<b>LLFA</b>	Lead Local Flood Authority
<b>NMU</b>	Non-Motorised User
<b>OUV</b>	Outstanding Universal Value
<b>PROW</b>	Public Rights of Way
<b>RB</b>	Restricted Byway (pedestrians, horse-riders, and non-mechanically propelled vehicle, includes horse-drawn vehicles and bicycles)
<b>ROWIP</b>	Countryside Access Improvement Plan (2015-2025)
<b>TRO</b>	Traffic Regulation Order
<b>WHS</b>	World Heritage Site
<b>WR</b>	Written Representation

## 2. Wiltshire Council's Response to Written Representations

Written Representation	Wiltshire Council Response
000683	Wiltshire Council has communicated with HE that the access to the field (Point 3 in the WR) could be taken from the proposed Allington Track Diversion, which might offer a better solution than accessing from the extension of Equinox Drive. This is currently under discussion with HE.
000684	<p>Wiltshire Council ecologists have been party to discussion on potential mitigation for ensuring retention of bat crossing points within the Scheme. The Council supports the provision of green bridges but do not support lesser structures such as "bat bridges". The topography of the area does not lend itself to an underpass for bats at this location. A green bridge is, in the Council's opinion, the only appropriate and sufficient mitigation available.</p> <p>Wiltshire Council agrees that the layby to the west of Scotland Lodge Farm should be closed and unavailable for use by vehicular traffic, and not accessible for inappropriate use.</p>
000686	See comment to 000684 above.
000691	<p>Western Section Point 1: This was discussed between HE and Wiltshire Council prior to commencement of the Public Consultation in 2018. Neither party considered that a safe crossing of the A303 could be provided for all users without the construction of a bridge or underpass. HE felt unable to include either in the Scheme. The provision of byways to the north and south of the A303 to and from Green Bridge 1 was considered by Wiltshire Council to be the best compromise that could be achieved.</p> <p>Western section Point 2: The Rights of Way and Countryside Act 2000 requires Wiltshire Council to publish a Rights of Way Improvement Plan that takes into account the present and likely future needs of the public. Provision through HE's proposals within the DCO application to provide alternative and new routes for non-motorised users accord with the aspirations of the ROWIP (Countryside Access Improvement Plan 2015-2025) to improve the connectivity of rights of way including bridleways and byways. The provision of this link will contribute to the ultimate aspiration to create a largely motorised traffic free user route for non-motorised users, linking the Wylve and Till Valleys and Salisbury Plain.</p> <p>Central Section Points 5, 6, and 7: Wiltshire Council is requesting motor vehicle restrictions on specified byways within the WHS, to be included in the draft DCO. Please see detail in response to Written Representation 000888 below.</p> <p>Central Section Point 8: Wiltshire Council is working with HE and other key stakeholders on a set of design parameters from which details for the surfaces and construction of new and existing rights of way will be developed. Wiltshire Council welcomes the input of user-group representatives to further inform this work.</p>

Written Representation	Wiltshire Council Response
000693	<p>Paragraph 2: The present A303 through the central section of the Scheme will become a restricted byway and private means of access for agricultural vehicles. Fences will be required to contain livestock in adjacent fields, and to prevent incursion by cyclists and equestrian users into areas where there is the potential of damage to be caused to the WHS. Wiltshire Council is requesting motor vehicle restrictions on specified byways within the WHS, to be included in the draft DCO. Please see detail in response to Written Representation 000888 below.</p> <p>Paragraph 3: Request for footbridge: Wiltshire Council has responded to the ExA's Written Question TR.1.33.</p>
000709	<p>Wiltshire Council supports Natural England's raising of these issues. Some finer detail is required although this may need to be presented through the LEMP.</p>
000711	<p>PFA submitted for Deadline 2, representations on behalf of client Amesbury Property Company and Classmaxi Ltd.</p> <p>A303 AMESBURY TO BERWICK DOWN DEVELOPMENT CONSENT ORDER REPRESENTATIONS ON BEHALF OF APC AND CLASSMAXI (REFERENCES A303 – AFP035 AND 20019749).</p> <p>The representation, inter alia, addresses an offer to treat with HE on land required for the Allington Track diversion, thereby avoiding compulsory acquisition. The offer is contingent, including a restriction on the width of the land offered for the highway; in particular the offer is contingent on maximum verge width of 1m.</p> <p>The Allington Track diversion will, when made, be vested with Wiltshire Council. The Council would seek to have minimum verge widths on new roads of 2m, in line with the minimum verge widths for single carriageway roads required by DfT TD27/05 para 4.7.6 (mandatory) which might be anticipated to carry ducting or chambers. Wiltshire Council considers that statutory undertakers should have adequate provision to facilitate the laying of their apparatus within verge, and not to have to place them in the carriageway. The National Joint Utilities Group GUIDELINES ON THE POSITIONING AND COLOUR CODING OF UNDERGROUND UTILITIES' APPARATUS assume a minimum width of 2m for the proper provision of and future access to apparatus.</p> <p>The Allington Track should be provided with adequate width in its verges to accommodate appropriate levels of stopping sight distance, in line with industry practice and in line with appropriate design standards.</p> <p>It is accepted that the width of the diverted road carriageway width should be 5.5m, which reflects the general approximate width of the remainder of the track towards the A338. Wiltshire Council accepts that, in places, the verge widths of the existing track may fall below the 2m width sought for the new length of road to be provided, but does not accept that as a valid reason to compromise unreasonably on the design for the new road.</p>

Written Representation	Wiltshire Council Response
	<p>The design proposals put forward to HE in the representation also refer to the exclusion of any embankment or cutting from the land to be offered for dedication as highway by Classmaxi Ltd. It is normal practise that land supporting the structure of a highway (embankments), should itself be included as part of the highway, so as to be in the full control of the highway authority. Wiltshire Council would expect this to be the case for Allington Track.</p> <p>Wiltshire Council considers it to be an inappropriate constraint on the eventual detailed designer of the highway to restrict the width available on the basis of an arbitrary (from a design point of view) consideration. At this time, the Council has no knowledge as to what apparatus statutory undertakers may wish to provide along the road corridor, or how the road drainage might be facilitated, especially if so constrained by an overall highway width of 7.5m.</p> <p>Whilst Wiltshire Council understands the position of the land owner in relation to the issues around land valuation in the event of a less constrained highway corridor being provided, it does not agree that the compromise sought by Classmaxi Ltd. Is sufficiently generous to allow an appropriately safe and efficacious outcome to be achieved for a road to serve its function for the foreseeable future.</p> <p>The Classmaxi representation makes reference to a meeting between HE and the Council on 5<sup>th</sup> May, 2019. It should be made clear that, at that meeting there was no discussion about the detail of the constraints on the ‘available’ land, as set out in the representation, and issues discussed around the subject were in respect of dedication and transfer principles only.</p> <p>A further representation has been submitted by Countryside Solutions on behalf of Beacon Hill Land Limited (BHLL), in relation to the necessity for compulsory acquisition of land to provide the Allington Track Diversion. However, the BHLL submission is materially different to the Classmaxi Ltd. Submission in that it does not overtly seek to restrict the width of the highway to such a degree that unreasonable constraints are applied. The BHLL submission states:</p> <p>“1.9. In respect of the diversion of The Allington Track via a new adopted highway, BHLL proposes to grant the Applicant a licence to temporarily occupy such of its land as identified in the DCO for the purposes of constructing the diversion works. BHLL would then dedicate as highway, such of its land as is necessary upon which the diversion works have been carried out.”</p> <p>The BHLL approach is quite acceptable to Wiltshire Council as the eventual vesting authority, because it provides for dedication <i>as highway such of its land as is necessary upon which the diversion works have been carried out</i>. It does not place onerous restrictions which could introduce operational and / or safety implications for the new road.</p>

Written Representation	Wiltshire Council Response
000713	See comment to 000711 above.
000730	The representation expresses concerns as to the extent of the stopping up of Stonehenge Road, seeking the stopped up length to be extended to the Stonehenge Road / Woodford Valley road junction. Whilst the Council understands the concerns of the farm owner, and acknowledges that parking for visitors to the WHS may park in Stonehenge Road, it considers that any parking would be better accommodated within the highway cul-de-sac beyond the Woodford Valley road junction than on the busier Stonehenge Road opposite the residential properties in that area, and in the vicinity of the junction, where there would be an increased risk to users and to road safety.
000733	Wiltshire Council agrees that the Allington Track Diversion road must be designed to a standard that suits all forecast users, including those large vehicles associated with large scale, modern day farming needing to pass along the new road and use its junctions. The issues raised in relation to parking obstruction on Equinox Drive is one which the Council would seek to resolve, if necessary, by way of a TRO, the funding of which is anticipated to be provided for, on a contingency basis, in a legal agreement with HE.
000734	Wiltshire Council agrees that it would be preferable, in relation to access to the farm by the largest farm vehicles, to have the option to gain access from the north, with access to Countess Road (N), rather than to make any special provision within the vicinity of Amesbury town centre (Church Street) for such large machinery to be enabled to access from the A345 and Salisbury Street.
000735	<p>Paragraph 14: The upgrading of BSJA3 to BOAT rationalises its existing use in substitution for the cross field BOAT BSJA3 which is currently unavailable. BSJA3 is more suitable for use by motorised vehicles, Extension as a BOAT to the east, alongside the A303 protects continuity of the vehicular rights.</p> <p>Paragraphs 16 - 26: Wiltshire Council is requesting motor vehicle restrictions on specified byways within the WHS, to be included in the draft DCO. Please see detail in response to Written Representation 000888 below.</p>
000737	<p>9.5 Presentation and appearance Section 9.5. Design Finishes: Wiltshire Council is working with HE and other key stakeholders on a set of design parameters from which details for the surfaces and construction of new and existing rights of way will be developed.</p> <p>In respect of paragraph 9.13.2, Wiltshire Council is not listed in Category 1 or Category 2 for Plot Ref 08-12. The Plot Ref is not currently adopted highway either. HE will need to advise what will be required to carry out deeper excavation before the Council's Property Team can comment on what may be required in respect of negotiation, if indeed Wiltshire Council need to be involved at all given it has no interest or rights in the Plot in question.</p> <p>9.15 Public Rights of Way, NMU routes and vehicular access across the WHS:            9.15.2 - 9.15.8; Wiltshire Council is requesting motor vehicle restrictions on specified byways within the WHS, to be included in the draft DCO. Please see detail in response to Written Representation 000888 below.</p>

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	<p>9.15.19: The Rights of Way and Countryside Act 2000 requires Wiltshire Council to publish a Rights of Way Improvement Plan that takes into account the present and likely future needs of the public. Provision through HE's proposals within the DCO application to provide alternative and new routes for non-motorised users accord with the aspirations of the ROWIP (Countryside Access Improvement Plan 2015-2025) to improve the connectivity of rights of way including bridleways and byways. The provision of this link will contribute to the ultimate aspiration to create a largely motorised traffic free user route for non-motorised users, linking the Wylve and Till Valleys and Salisbury Plain. However, the Council would prefer that this link does not pass through the Visitor Centre car park and are actively urging HE to do everything possible to try to establish the route, as a restricted boundary, on land immediately to the south and east of the car park to emerge onto the former A344.</p>
000741	<p>In respect of table item number 2 of Part 2 (page 8), Wiltshire Council cannot confirm the position as to ownership of the subsoil of the B3083. This will not be able to be confirmed until the B3083 is stopped up and claims for ownership received.</p> <p>Representation 9. Wiltshire Council has no objection to the proposal that the bridleway / cycleway link to Winterbourne Stoke be provided to the southern side of the existing A303.</p> <p>Representation 10: Wiltshire Council has a statutory duty under the Highways Act 1980 to assert and protect, as far as possible, the rights of the public to the use and enjoyment of the highways in its area. Wiltshire Council's Rights of Way Officers are concerned that motorised users in particular of Byway WSTO6B will not agree that downgrading the byway will improve the rights of way network.</p> <p>Representation 14: The Council supports the Turner family's request that HE assess the impact of compaction on the underlying geology. Wiltshire Council would require evidence that the proposed development will not alter the drainage characteristics of the site area so as to cause flooding (ponding) or lead to increased surface water runoff.</p>
000747	<p>Discussions between HE and Wiltshire Council's Rights of Way officers took place prior to commencement of the Public Consultation in 2018. Neither party considered that a safe crossing of the A303 for all users could be provided without the construction of an overbridge or underpass. Wiltshire Council officers requested the provision of a byway open to all traffic (BOAT) either side of the A303 to enable all users to cross the A303 at Green Bridge 1. Concerns from landowners and occupiers about possible misuse of a new BOAT (fly-tipping, camping, hare-coursing and other rural crime) led to HE deciding to propose that the link routes to Green Bridge 1 should be Restricted Byways, other than for the short section to the south of the A303 and east of BSJA3 giving access for motorised users to reach Winterbourne Stoke. The existing at grade crossing at the western end of the Scheme at Yarnbury Castle would remain open for motorised users of SLAN BOAT3 and non-motorised users who do not want to travel the additional distance to Green Bridge 1. Wiltshire Council will be pleased to work with land managers and the police to minimise any problems of misuse.</p>

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000810	<p>Wiltshire Council supports The Environment Agency raising of these issues. Some finer detail is still to be explored but does not appear to be insurmountable.</p> <p>Further to the issue of dewatering raised in section 1.6, Wiltshire Council has also raised concerns about the potential flooding impacts associated with dewatering for the tunnel construction. Wiltshire Council has requested that the Applicant specify a tunnel construction method that minimises dewatering, instead of leaving the choice of tunnel construction method to the appointed Contractor. Wiltshire Council is in agreement with the EA that a separate risk assessment will be required for any discharge associated with dewatering to ensure that flood risk is not increased. The flood risk assessment would need to be approved by Wiltshire Council and may require land drainage consent.</p> <p>Further to section 2.3, like the EA, Wiltshire Council has not been provided with the final Flood Risk Assessment and therefore cannot comment.</p> <p>Further to section 6, Wiltshire Council is in agreement with the EA that additional requirements are needed for the CEMP and HEMP and that these should be prepared in consultation with Wiltshire Council.</p>
000812	<p>Part of this representation, 4-Allington Track, questions the requirement to acquire land in order to deliver the new road link. Wiltshire Council is satisfied (as the intended vesting authority) that it can accept a dedication of adequate highway rather than a freehold title to the highway if such an agreement can be reached with HE to avoid compulsory acquisition.</p> <p>Section 4, Paragraph 19. Wiltshire Council also agrees that it is not necessary for the applicant to acquire this section of the byway in order to convert its status to a footpath, if the present landowner is willing to enter into a legal agreement under Section 116 of the Highways Act 1980 to stop up higher rights.</p> <p>Section 11, Creation of Public Rights of Way, paragraphs 31 - 33: The Rights of Way and Countryside Act 2000 requires the Council to publish a Rights of Way Improvement Plan (ROWIP) which takes into account the present and likely future needs of the public. Provision through HE's proposals as contained in the application for the DCO to provide alternative and new routes for non-motorised users accord with the aims of the Council's ROWIP (Countryside Access Improvement Plan 2015-2025) and in particular, to improve connectivity of byways. Wiltshire Council will be pleased to work with land managers and the police to minimise any problems of misuse.</p> <p>Paragraph 35 and Section 13, Decommissioning of the A303 Paragraph 39: Wiltshire Council is working with HE and other key stakeholders on a set of design parameters from which details for the surfaces and construction of new and existing rights of way will be developed.</p>



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	<p>Paragraph 40: Current expectations are that Wiltshire Council, as the local highway authority, will take on the maintenance of the surface as a Restricted Byway. Discussions will need to be held between HE, Wiltshire Council and any new holders of private means of access (including access for agricultural vehicles) in respect of any additional maintenance issues arising from the private rights of use.</p>
000814	<p>ExA's first written questions and requests for information, Paragraph 15: Wiltshire Council considers that the traffic management issues on Byways 11 and 12 that will arise from implementation of the Scheme are matters that will arise as a direct consequence of the Scheme and can be addressed with the DCO. Wiltshire Council is requesting motor vehicle restrictions on specified byways within the WHS, to be included in the draft DCO. Please see detail in response to Written Representation 000888 below.</p>
000816	<p>6.2.1. and 6.2.5, 6.8.8a, 6.8.9a, 6.8.18 d-f, 6.11.1: Wiltshire Council is working with HE and other key stakeholders on a set of design parameters from which details for the surfaces and construction of new and existing rights of way will be developed.</p> <p>6.8.10: Wiltshire Council is requesting motor vehicle restrictions on specified byways within the WHS, to be included in the draft DCO. Please see detail in response to Written Representation 000888 below.</p>
000822	<p>Section 5 5.1 to 5.3: There is concern over ground water recharge with the relocation of a ditch. The proposed outline will be fixed with the detailed design works and ground water recharge can be modelled to ensure that there is no dis-benefit to the landowner. Any dis-benefit can be mitigated against dependent on the flows shown with the HE modelling.</p> <p>Section 8. HE is required to provide a suitable replacement highway for traffic that will be unable to use the tunnel route. This will include pedestrians, cyclists and equestrians including carriage drivers. Wiltshire Council believes that there is a likely increased future demand for equestrian access to the public rights of way created in mitigation. The Rights of Way and Countryside Act 2000 requires the Council to publish a Rights of Way Improvement Plan (ROWIP) which takes into account the present and likely future needs of the public. Provision through HE's proposals as contained in the application for the DCO to provide alternative and new routes for non-motorised users accord with the aims of the Council's ROWIP (Countryside Access Improvement Plan 2015-2025) and in particular, to improve connectivity of byways. HE's proposals will contribute to the ultimate aspiration to create a largely motorised-traffic free multi-user route for walkers, cyclists, horse-riders and carriage-drivers between the Wylde and Till Valleys to Salisbury Plain. This extended and improved network could provide new opportunities for equestrian businesses to expand both the riding opportunities that will be available to them and the businesses themselves.</p> <p>Section 9: Wiltshire Council is requesting motor vehicle restrictions on specified byways within the WHS, to be included in the draft DCO. Please see detail in response to Written Representation 000888 below.</p>
000828	<p>Section 5 has raised two concerns. and these will be covered under the detail design and any measures needed to protect the River Avon SAC will form part of the environmental plan that will come from the detail design.</p>

Written Representation	Wiltshire Council Response
	<p>Blick Mead surveys are still ongoing and this is being checked as part of the works carried out by Aecom as HE consultants. There is a recommendation that further sources of water from wells and springs should be included within the assessment. As Lead Local Flood Authority (LLFA) we can pass this on to HE.</p>
000832	<p>This representation makes similar points as 000812, 000711 and 000713 in relation to the need for Compulsory Acquisition for the provision of new roads. If BHLL can reach agreement with HE, Wiltshire Council would be willing to accept a dedication.</p> <p>2.6: Wiltshire Council agrees that the stopping up of higher rights other than pedestrian rights can be achieved without the need for HE to acquire ownership of the land, but only if the landowner consents. However, the Council would prefer to see the achievement of this objective within the DCO instead of being left to be dealt with outside of it by HE and the Council.</p> <p>4.1: Wiltshire Council has a statutory duty to protect and assert, the rights of the public to the use and enjoyment of the highway and to prevent, as far as possible, the stopping up or obstruction of the highway. It is arguable that it is not necessary to stop up any of the existing public rights of way over this section of Byway 1 except where it meets the A303, on safety grounds. Nevertheless, if access for all users to the A303 is to be stopped-up, the Council does not believe that the byway will be needed for use by equestrians and cyclists. The Council does, however, consider that (a) whether or not interpretation boards are provided at the junction with the proposed new highway diversion between Allington Track and the Amesbury Road, people may wish to walk along the route to view the tumulus adjacent to the byway approaching the A303 and (b) as a recreational access for people working at Solstice Park to take exercise away from motorised traffic during work breaks. Access along the right of way does not give a right to enter the neighbouring field to give physical access to the tumulus.</p>
000836	<p>The representation seeks the removal of the hard surface of the stopped up section of the Allington Track. Whilst the Council has no reason to object to this, it would point out to the ExA that other users of the track might wish to retain hard surface to facilitate on-going use of the hard surface for access to land.</p>
000839	<p>2.1.8.: There is no current proposal to downgrade the status of Byways 11 and 12. Wiltshire Council is requesting motor vehicle restrictions on specified byways within the WHS, to be included in the draft DCO. Please see detail in response to Written Representation 000888 below.</p> <p>3.1.2: If the prohibition of driving order as described above is included in the DCO, many of the problems described will be largely overcome. Without the prohibition of driving order, Wiltshire Council believes that the numbers of vehicles using the byways is likely to increase, perhaps exacerbating the misuse described (although the Council would continue to work with land managers and the police to minimise any such issues).</p>

Written Representation	Wiltshire Council Response
	<p>3.2: The Rights of Way and Countryside Act 2000 requires the Council to publish a Rights of Way Improvement Plan (ROWIP) which takes into account the present and likely future needs of the public. Provision through HE's proposals as contained in the application for the DCO to provide alternative and new routes for non-motorised users accord with the aims of the Council's ROWIP (Countryside Access Improvement Plan 2015-2025) and in particular, to improve connectivity of byways. The provision of a link between Druids Lodge and the Stonehenge Visitor Centre will contribute to the ultimate aspiration to create a largely motorised-traffic free multi-user route for walkers, cyclists, horse-riders and carriage-drivers between the Wylde and Till Valleys to and from Salisbury Plain.</p>
000840	<p>The Council refers to the Trail Riders written representations and in particular paragraphs 5.7 and 5.10 to 5.13 where they suggest the need for consistency of decisions with the 2004 and 2011. Whilst these decisions are relevant background there has been significant change in the area since 2011 which also needs to be considered.</p> <p>Since the closure of the A344 to motorised vehicles in October 2013, it has been found that increasing numbers of visitors are now using the byways to either avoid paying the entrance fee, avoid the queues at the Stonehenge Visitors Centre or to simply undertake a quicker visit. Photographic evidence shows numbers of parked vehicles, including vans, caravans and camper vans, on byways 11 and 12 and congestion on the byways arising from increased vehicle movements and parked vehicles.</p> <p>Internet searches bring up a number of ways to access and view Stonehenge free of charge by using the byways within the WHS. The advice currently available online is heavily focused on the use of the byways within the WHS for accessing and parking purposes in order to undertake a visit to Stonehenge. Two links dealing with free access to Stonehenge by using the byways are set out below:</p> <ul style="list-style-type: none"> <li>• <a href="https://thirdeyetraveller.com/how-to-visit-stonehenge-for-free/">https://thirdeyetraveller.com/how-to-visit-stonehenge-for-free/</a></li> <li>• <a href="http://bodeswell.org/2018/05/08/camping-and-visiting-stonehenge-for-free/">http://bodeswell.org/2018/05/08/camping-and-visiting-stonehenge-for-free/</a></li> </ul> <p>Up to October 2013, Byway 11 from the A303 to the byways leading to Springbottom Farm was usually found to be good, flat and level (i.e. in a reasonable condition) and occasional repairs were required on a frequency corresponding to a very lightly trafficked byway. Following the closure of the A344 to motor vehicles in 2013, it was noted by officers that the number of motor vehicles using the WHS was increasing. Byway 12 was repaired north of the C506 and the Wiltshire Council Duty Engineer familiar with the condition of the byways through regular walked and driven site visits, has found that since 2013 there has been an increase in vehicles using both byways 11 and 12 and beyond causing greater damage to the maintainable surface of the byways. Repairs were limited to a minimum acceptable standard as there was concern that a much-improved surface could encourage greater vehicular use, ultimately causing more damage to the byway.</p>

Written Representation	Wiltshire Council Response
	<p>Officers undertaking inspections found that byway 12 was being used by cars, motorbikes, vans and on occasions heavy goods vehicles (a 44T HGV). The new granular stone surface of byway 12 was found to be degrading due to the increase in traffic using byway 12. Byway 12's condition has continued to deteriorate and there were concerns that the condition was becoming unsuitable for certain classes of non-motorised users such as equestrians and cyclists. In dry weather the deep rutting would cause the byways to be difficult for horses and cyclists to safely negotiate and in wet weather water pooling in the ruts makes it difficult for users to judge the depth of the rut. Byway 12 is now in a similar condition to that before the major repairs were undertaken in 2013. The large rutted area has also now begun to reappear in the dip towards Larkhill. The increased use and degradation of the byways and the potential for significant increased vehicular use as a result of the project was supported by submitters at the open forum including local land owners.</p> <p>In respect of paragraph 7.2 to 7.6 The Trail Riders written representation provides comment on our relevant representations with a focus on the issue as to whether the issues relating to Byways 11 and 12 are associated development. The Council's position is that the closure of the current A303 will turn AMES 11 into a cul-de-sac and therefore the issue of how to deal with this situation falls within "ancillary to the development" under section 120 (3) of the Planning Act 2008 and having regard to the evidenced increased use since 2011 and the evidence of potential further increased use, the Wiltshire Council's Core Strategy (Core Policy 59) and the Stonehenge and Avebury World Heritage Site Management Plan 2015 aims to reduce the negative impacts on roads and traffic on the WHS and its attributes of OUV and increase sustainable access to the WHS it is appropriate that the nature of the byways be considered as part of the project.</p>
000841	<p>The attenuation ponds have been located in areas away from the surface water flows and above the seasonal high ground water levels to ensure that they are not effected by ground water. This is in line with planning policy. The drainage has also been designed to include climate change allowance with freeboard and no exceedance up to 40% climate change allowance.</p>
000844	<p>Achieving / improving alignment; considerations and recommendations: There has, to the knowledge of Wiltshire Council, been no proposal for the provision of a 4.5 metre wide bound surface within the decommissioned A303. Wiltshire Council has accepted a minimum bound surface width of 3.0 metres within the overall 9.0 metre width of the new restricted byway. Wiltshire Council is working with HE and other key stakeholders on a set of design parameters from which details for the surfaces and construction of new and existing rights of way will be developed. In respect of Byways 11 and 12, Wiltshire Council is requesting the inclusion within the DCO of a prohibition of driving order, on both byways (and others within the WHS), to restrict motor vehicles with the exception of vehicles in the services of the Police Authority, Fire and Rescue Authority and the Ambulance Service, statutory undertakers, public services (and their contractors, Highways England and their contractors and English Heritage and their contractors), agricultural vehicles and motorcycles.</p> <p>Wiltshire Council strongly rejects the proposal put forward in this representation (2.3 Countess Junction) that there should be no provision of street lighting at the junction. It is considered essential that lighting be provided at the junction for safety reasons, especially given the</p>

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	proposals to provide north-south non-motorised user (NMU) routes to both the west and east side of the junction. It should be noted that the junction is currently lit; as far as the Council is aware the existing lighting is not a source of material concern, and the existing lighting could be replaced by a modified arrangement, taking into account industry innovations and improvements to lighting technology since the existing scheme was introduced, and providing for the necessary changes resulting from the proposed provision of two new overbridges carrying the A303.
000868	Blick Mead, water meters and the effects of the ground water on archaeology, ongoing discussions on ground water. The outputs from the water meters may be helpful in the ongoing monitoring of the site both pre-and post-development.
000871	This representation includes reference (p4 Transport) to concerns about the impacts resulting from closure of the tunnels. Wiltshire Council would respectfully invite the ExA to challenge the evidence put forward in relation to the likely frequency of tunnel closures (actual at Hindhead, forecast at Stonehenge), the timing of the closures (planned), and the frequency of use of the A303 by high and / or abnormal loads.
000881	<p>Wiltshire Council supports the view expressed by Mr Whiting that there is no need to retain the A303 layby west of Scotland Lodge Farm.</p> <p>Discussions between HE and Wiltshire Council's Rights of Way officers took place prior to commencement of the Public Consultation in 2018. Neither party considered that a safe crossing of the A303 for all users could be provided without the construction of an overbridge or underpass. Wiltshire Council officers requested the provision of a byway open to all traffic (BOAT) either side of the A303 to enable all users to cross the A303 at Green Bridge 1. Concerns from landowners and occupiers about possible misuse of a new BOAT (fly-tipping, camping, hare-coursing and other rural crime) led to HE deciding to propose that the link routes to Green Bridge 1 should be Restricted Byways, other than for the short section to the south of the A303 and east of BSJA3 giving access for motorised users to reach Winterbourne Stoke. The existing at grade crossing at the western end of the Scheme at Yarnbury Castle would remain open for motorised users of SLAN BOAT3 and non-motorised users who do not want to travel the additional distance to Green Bridge 1.</p>
000888	<p>Wiltshire Council is requesting motor vehicle restrictions on specified byways within the WHS, to be included in the draft DCO. The restrictions would apply to motor vehicles, with the exception of vehicles in the services of the Police Authority, Fire and Rescue Authority and the Ambulance Service, statutory undertakers, public services (and their contractors, Highways England and their contractors, and English Heritage and their contractors), agricultural vehicles and motorcycles. The specified bywayd are Byways Open to All Traffic (BOAT) and Restricted Byway (RB):</p> <ul style="list-style-type: none"> <li>• BOAT Durrington 10 (from its junction with Fargo Road to its junction with BOAT Amesbury 11 and C506)</li> <li>• BOAT Amesbury 11 (full length)</li> <li>• BOAT Amesbury 12 (from its junction with BOAT Durrington 10 crossing over C506 to its junction with A303)</li> <li>• BOAT Amesbury 12 from its junction with A303 to its junction with BOAT Wilsford cum Lake 1</li> </ul>

Written Representation	Wiltshire Council Response
	<ul style="list-style-type: none"> <li>• RB (old surface route of A303 length of 400 metres from its junction with BOAT Amesbury 11 to its junction with BOAT Amesbury 12)</li> <li>• BOAT Wilsford cum Lake 1 (full length)</li> <li>• BOAT Wilsford cum Lake 2 (full length)</li> <li>• BOAT Berwick St. James 11 (full length)</li> <li>• BOAT Woodford 16 (full length).</li> </ul>
000895	<p>The report states that the compaction of tunnel arisings at Manor Farm, to stabilise it on the slope, will produce an impermeable cap over the existing permeable chalk, which will lead to increased surface water runoff. Wiltshire Council are awaiting the final modelling results demonstrating no detriment in terms of surface water management.</p> <p>Wiltshire Council supports the report's suggestion in section 7.8 for testing to assess the impact of construction traffic on the permeability of the chalk pasture.</p> <p>The report states that HE have not assessed the risk of flooding based upon the January 1841 and autumn 2000 flood events, and that the 2000 flood event in fact exceeds the 2014 event that has been considered. Wiltshire Council requests that HE respond to these statements and provide evidence of the robustness of their flood risk assessment and how these events have been accounted for.</p>

## Appendix A - List of Written Representations Reference Numbers and Names

Written Representation	Written Representation Name
000683	Lincoln College
000684	Winterbourne Stoke Parish Council
000686	Dr A D Shuttleworth and Winterbourne Stoke Parish Council
000691	Myra Bennett
000693	Wiltshire Ramblers
000709	Natural England
000711	The Amesbury Property Company Ltd.
000713	Classmaxi Ltd.
000730	Mrs P M Sandell
000733	P J Rowland & Sons (Farmers) Limited
000734	Mr Philip Sawkill
000735	Peak District Green Lanes Alliance
000737	English Heritage Trust
000741 / 000895	The Turner Family
000747	Stratton Family
000810	Environment Agency
000812	National Farmers Union
000814	Green Lanes Environmental Action Movement
000816	National Trust
000822	Morrison & King Limited
000828	Amesbury Abbey Group
000832	Beacon Hill Land Limited
000836	Mrs Kathleen Edna Crook
000839	Rachel Hosier
000840 / 000888	Trail Riders Fellowship
000841	Steven Moore
000844	Stonehenge and Avebury WHS Coordination Unit
000868	Mark Bush on behalf of the Blick Mead Archaeology Team
000871	Andrew C J Rhind-Tutt
000881	Mr F W G Whiting