

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

**Wiltshire Council (A303-AFP022) Comments  
on First ExA Question Responses**

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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>dDCO</b>	draft Development Consent Order
<b>DfT</b>	Department for Transport
<b>DMRB</b>	Design Manual for Roads and Bridges
<b>EA</b>	Environment Agency
<b>ES</b>	Environmental Statement
<b>ExA</b>	Examining Authority
<b>ETRO</b>	Experimental Traffic Regulation Order
<b>FRA</b>	Flood Risk Assessment
<b>HE</b>	Highways England
<b>HEMP</b>	Handover Environmental Management Plan
<b>LEMP</b>	Landscape and Ecological Management Plan
<b>LLFA</b>	Lead Local Flood Authority
<b>NMU</b>	Non-Motorised User
<b>OEMP</b>	Outline Environmental Management Plan
<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>	Rights of Way Improvement Plan
<b>S106</b>	Section 106
<b>SoCG</b>	Statement of Common Ground
<b>SWLEP</b>	Swindon and Wiltshire Local Enterprise Partnership

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<b>TBM</b>	Tunnel Boring Machine
<b>TRO</b>	Traffic Regulation Order
<b>WFD</b>	Water Framework Directive
<b>WHS</b>	World Heritage Site
<b>WR</b>	Written Representation

## 2. Wiltshire Council's Comments on First ExA Question Responses

Question	Responder	Wiltshire Council Response
G.1.10	Applicant	<p>The ETRO is no longer in place. However, Wiltshire Council believes that the severed link for motorised users between byways 11 and 12 will bring adverse changes to the use of both byways as a direct association. Byway 11 will become a cul-de-sac for motorised vehicles at its northern end, requiring them to make turn manoeuvres and to return along the byway to complete their journey and increasing pressure on the grass sward surface. Rutting is already being caused in some places from use by motor vehicles. The cul-de-sac, from which there is an excellent view of the Stones themselves and the surrounding landscape has, in the Council's view, the real prospect of being used for camping by travellers and short-term visitors, as well as providing a free car park giving direct access to the new Restricted Byway on the line of the decommissioned A303 and the permissive access allowed to the wider landscape of the WHS. Cumulatively, these new uses will significantly increase the number of vehicles using this part of the WHS, within direct view of the Stones. The Council considers that the adverse effects of the severance can and should be addressed within the DCO by the placing of restrictions on motor vehicle use on specified byways within the World Heritage Site, 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 byways 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> <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>
AG.1.4	Applicant	(i) The Rights of Way and Countryside Act 1981 requires Wiltshire Council to publish a Rights of Way Improvement Plan (ROWIP) which takes into account the present and likely future needs of the public. Provision though Highways England's

Question	Responder	Wiltshire Council Response
		proposals as contained in the DCO application to provide alternative and new routes for non-motorised users accords with the aims of the Council's ROWIP (Countryside Access Improvement Plan 2015-2025) and in particular to improve connectivity of byways. The proposals will, taken collectively, contribute to the aspiration to create largely motorised traffic free multi-user routes for walkers, cyclists and equestrians (including carriage drivers) between the Wylve and Till Valleys and Salisbury Plain.
AG.1.6	Applicant	The importance to local ecology, of the location of Green Bridge 1 must not be diminished. If the green bridge were to be relocated for access purposes, a suitable crossing for wildlife, particularly bats would be required AT THIS LOCATION.
AG.1.16	Applicant	Wiltshire Council anticipate that a side agreement will make provision for the payment by HE to Wiltshire Council for the costs of Traffic Regulation Orders which, in the light of operational experience, are required to be made by the Council to properly control traffic on local roads affected directly or indirectly by the Scheme.
AG.1.18	Applicant	The Council has worked with the EA and HE to ensure that the CEMP and the OEMP cover the activity during the construction of the tunnel. Officers have asked for the pre-and post-catchment to be modelled to ensure that the haul roads and reprofiling does not impact on surface water flows or increase flood risk.
AG.1.25	National Farmers Union	The Local Authority is responsible for the regulation of private water supplies used for human drinking water purposes. In the event of a supply being found to be inadequate or failing drinking water standards, the Applicant shall notify Public Protection Services at Wiltshire Council.
AQ.1.21	Applicant	Please refer queries with regard to Radon to Public Health England.
AL.1.20	Applicant	Please see response to G.1.10 above.
AL.1.20	National Trust	Please see response to G.1.10 above.
CH.1.1	Applicant	Wiltshire Council is disappointed that the additional information requested has not been provided. Furthermore, the Council disagrees that an addendum to the Environmental Statement is not required.
CH.1.11	Applicant	The ExA is respectfully requested to consider the relative merits of cut-off street lighting at the Longbarrow Junction and its effects compared with the proposed use of traffic signals controls, which, with regularly changing aspects, may have an undesirable impact.
EC.1.6	Applicant	The Scheme will address how the risks to the watercourses including the Till and Avon are managed. This is proposed to be via the Environmental Statement that is included within the dDCO and will be constructed in accordance with the OEMP. All works must comply with HE guidelines, planning policy and WFD guidelines.
CA.1.25	Applicant	Wiltshire Council is in discussion with Highways England regarding the information contained within the Book of Reference, specifically in respect of land which Wiltshire Council is noted as the owner or beneficiary of rights but has no record of ownership, and any amendments or further information which may be required.

Question	Responder	Wiltshire Council Response
CA.1.26	Applicant	Wiltshire Council is in discussion with Highways England regarding the information contained within the Book of Reference, specifically in respect of unregistered land which Wiltshire Council is noted as the owner or beneficiary of rights but has no record of ownership, and any amendments or further information which may be required.
CA.1.43	PFA Consulting on behalf of The Amesbury Property Company Limited (APC) and Classmaxi Limited (CML)	At the time of writing, the Council is in discussion with Classmaxi Ltd. representatives about finding a way forward that can a) enable land requirements for the Allington Track Diversion to be dealt with outside the Compulsory Acquisition process and b) to explore how such an arrangement might be embodied in a side agreement between HE and Classmaxi which would also be acceptable to Wiltshire Council as the eventual vesting authority.
CA.1.45	Countryside Solutions on behalf of Beacon Hill Land Limited	Wiltshire Council understands that Beacon Hill Land Limited (BHLL) does not seek to impose width restrictions to their land in the same manner as Classmaxi Ltd. The Council has no objection to the use of a dedication agreement if normal highway cross section is achieved, including visibility to provide appropriate stopping sight distances.
CA.1.45	Applicant	See response to Countryside Solutions for question CA.1.45 immediately above.
DCO.1.4	Applicant	<p>The Council considers that the adverse effects of the severance can and should be addressed within the DCO by the placing of restrictions on motor vehicle use on specified byways within the World Heritage Site, 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 byways 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> <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>
DCO.1.31	Applicant	The Council draws attention of the ExA to the apparent improper use of the phrase 'temporary stopping up' in the DCO. Stopping up of highway is a permanent state. HE have indicated that as the phrase has been used in the Government advice notes on DCO preparation that it is acceptable. That appears to be simply perpetuating a wrong.

<b>Question</b>	<b>Responder</b>	<b>Wiltshire Council Response</b>
DCO.1.32	Applicant	Access routes will be addressed in the OEMP modifications to be sought by the Council.
DCO.1.40	Environment Agency	Wiltshire Council has asked for the maintenance of the drainage to be considered throughout the process and some may be retained by HE and others may become the responsibility of Wiltshire Council as the local highway authority. The design, operation and maintenance of the drainage must be taken into account throughout the process.
DCO.1.95	Applicant	Discussion with Highways England and other major stakeholders including Wiltshire Council are taking place to establish overall design parameters within the OEMP. This will include a commitment within the OEMP from Highways England to agree detailed designs with those stakeholders. On that understanding, there should be no need for a specific requirement in the dDCO.
DCO.1.95	National Trust	See response to Applicant for question DCO.1.95 immediately above.
DCO.1.99	Applicant	The Council would be broadly supportive of bullet iii. The Council suggests that the opening wording of requirement 7 be clarified by substituting the following wording "7.- (1) In the event that contamination of land and / or ground water is identified at any time..."
DCO.1.104	Applicant	Wiltshire Council will seek a provision in the OEMP to address the approval of temporary access points and their removal.
DCO.1.106	Applicant	It has been outlined that the undertaker must consult with the local planning authority and the Environment Agency on a programme, until a detailed design is available this cannot be progressed. The Council has agreed the outline of the approach with the Applicant and with the Environment Agency and this has been peer reviewed by the Council's framework consultants (Atkins). However, further detail is awaited that is not available at this stage.
DCO.1.107	Environment Agency	The Handover Environmental Management Plan (HEMP) will outline how the development must be operated and maintained. Wiltshire Council requests that the HEMP be prepared in consultation with Wiltshire Council.
FG.1.1	Applicant	The advice of Public Health England should be sought with respect to Radon.
FG.1.10	Applicant	HE states that "the principle of the design is to minimise dewatering" and "based on the current design and construction methods it is assumed that no abstraction of groundwater or surface water will be required". However, "temporary and localised groundwater control" could be required. Given the flood risk that large scale dewatering could introduce in an area with past flooding issues, Wiltshire Council supports the use of a tunnel construction method that minimises the need for dewatering.
FG.1.11	Applicant	The mitigation measures in HE's response assumes the use of a tunnel boring machine (TBM), however the tunnel construction method, and associated dewatering requirements, is not confirmed at this stage. Chapter 2 of the ES states that a TBM is "likely to be used", but the choice of method would be left to the appointed contractor. The Council requires for dewatering mitigation measures to be secured within the DCO.
FG.1.14	Applicant	Wiltshire Council requests automated control of the tunnel drainage system.

Question	Responder	Wiltshire Council Response
FG.1.17	Applicant	Wiltshire Council provided comments on the additional groundwater reports, in the form of an addendum to its written representation, to the examining authority at deadline 2a. There are a number of groundwater issues which still require resolution and / or clarification. The additional reports did not address the outstanding road drainage and surface water peer review actions.
FG.1.20	Applicant	<p>In response to point 4: DMRB guidance in document HD45/09 states that "as climate change allowances are continually being reviewed they are subject to change and it is therefore recommended that the designer should consult with the Environment Agencies (EAs) to agree the allowances to be made". The EA recommended allowances are 40% in this instance, therefore Wiltshire Council requests that the 40% allowance be used for the road drainage design, as was done for the land drainage design.</p> <p>In response to point 6: Wiltshire Council is the statutory authority responsible for leading on groundwater flood risk management, therefore the methodology for the groundwater flood risk assessment should be agreed with Wiltshire Council, in addition to being agreed with the EA.</p> <p>In response to point 7: The peer review recommended that monitoring data comparisons be used "to inform caveats to be applied to the use of absolute levels for flood levels or in scheme design. The model is likely to be more reliable for predicting changes in heads (and flows) rather than absolute levels. Modelling absolute levels in extreme events would particularly hold uncertainty. The predicted position of the water table in terms of depth below ground should be used with a degree of caution".</p>
FG.1.21	Applicant	<p>The peer review concluded the following:</p> <ul style="list-style-type: none"> <li>- There is an increase in pluvial flood risk due to the proposed Scheme however the area of land affected is within the proposal boundary.</li> <li>- There is a risk that the culvert at Parsonage Down could increase the rate of runoff into the River Till. This can be checked once Wiltshire Council receives the revised culvert design and modelling outputs.</li> <li>- The catchment adjacent to Blick Mead is reported to see an increase in runoff from 292l/s to 328l/s. The associated outfall is not attenuated via one of the DTAs. Whilst it is understood that the archaeology local to this catchment requires the ground to be saturated, there is no consideration in the strategy for any impact this increase in peak flow will cause on the River Avon.</li> </ul>
FG.1.22	Wiltshire Council	Wiltshire Council is awaiting the final revised culvert design and associated modelling.
FG.1.25	Applicant	These points have been discussed with Wiltshire Council, however no further modelling outputs or updated FRA has been received to date.



Question	Responder	Wiltshire Council Response
FG.1.30	Applicant	The OEMP states that the maintenance requirements will be outlined in the HEMP.
FG.1.32	Environment Agency	Wiltshire Council supports the EA's request that consultation with the EA be written into requirement 10.
FG.1.37	Applicant	The Non-statutory technical standards for sustainable drainage systems (March 2015) requires the following - "S9. The design of the site must ensure that, so far as is reasonably practicable, 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". The peer review found that "it is likely that detailed design will impact on existing overland flow routes". Wiltshire Council is awaiting the overland flow route information.
FG.1.39	Environment Agency	Wiltshire Council supports the EA's request that consultation with the EA be written into requirement 10.
FG.1.41	Applicant	Should the final design or construction methods require the discharge of abstracted water, the assessment of risk and identification of any required mitigation measures should also be achieved through whichever regulatory regime is ultimately agreed with Wiltshire Council i.e. land drainage consenting or protective provisions within the DCO.
HW.1.12	Applicant	The Council considers that the adverse effects of the severance of the link for motorised users can and should be addressed within the DCO by the making of a prohibition of driving order on both byways, to exclude public use by motor vehicles, with the exception of motorcycles. There will also need to be an order to permit the driving of motor cycles by the public on the section of the former A303 only between the entrances to byways 11 and 12.
HW.1.15	Applicant	Please see response to DCO.1.4 above.
HW.1.18	Applicant	Please see response to DCO.1.4 above.
LV.1.9	Applicant	Wiltshire Council is disappointed that all of the requested additional photomontages will not be provided. The Council is of the opinion that HE should attempt to get landowner permission to enable the visuals to be prepared as just because it is not currently public access, is not a valid reason to not get the view point recorded. The Council is concerned with potential adverse impact on setting and inter relationships between heritage assets.
NS.1.2	Applicant	Public Protection has made comment through the SoCG with HE. The Council will also be seeking changes to the OEMP.
SE.1.10	Applicant	The Allington Track Diversion will be provided with a 5.5m wide carriageway, and passing places will be included to facilitate movement to Boscombe Down even by the largest of vehicles (abnormal loads) anticipated to use the road.
SE.1.22	Applicant	Wiltshire Council would strongly support such a policy. The Council's Employment and Skills strategy references our pledge to work with partners to maximise opportunities for apprenticeships. For example, the Council has a Local Labour Market Agreement S106 template to help promote employment for underrepresented groups. The SWLEP Apprenticeship Growth strategy is aimed at increasing the number of apprenticeship starts in Wiltshire.
SE.1.23	Applicant	Wiltshire Council would support the view that clarity of directional signing during construction and following Scheme completion is important. Access for visitors will clearly be much easier for visitors' post construction because they will

Question	Responder	Wiltshire Council Response
		not be needing to consider the use of local alternative routes to avoid the delays on the A303, as they do currently; the alternative routes are, of course, not signed to the facility.
SE.1.30	Applicant	Wiltshire Council will support this through the Employment and Skills Board in partnership with other stakeholders such as the Swindon and Wiltshire Local Enterprise Partnership (SWLEP). There is an opportunity for working closely with local Further Education / Higher Education providers in skilling and upskilling the required workforce which the Council will facilitate. The Council would use its local labour market agreement to set targets for the proportion of construction jobs to be filled by local people.
SE.1.34	Jonathan Morris	See the socio-economic benefits highlighted in the Local Impact Report.
TR.1.10	Applicant	Wiltshire Council considers that the issue of 'rubbernecking' has been exacerbated in recent years particularly as a result of the widespread use on mobile phones for taking images of the Stones whilst passing. Vehicles have been observed to practically come to a standstill to fulfil this activity, oblivious to the impact on following traffic.
TR.1.20	Cycling Opportunities Group for Salisbury	(i) Discussions between Highways England 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 could be achieved without the construction of a bridge or underpass. Wiltshire Council officers requested the provision of a byway open to all traffic (BOAT) on both the north and south sides 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 byway (fly tipping, camping, hare-coursing and other rural crime) led to Highways England deciding to propose that the link routes to Green Bridge 1 should be created as 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 of the A303 at Yarnbury Castle would remain open for motorised uses of SLAN3 and non-motorised users who chose not to travel the additional distance to Green Bridge 1.

## Appendix A - List of Questions and Responses Commented On

Question	Responder Name
G.1.10	Applicant
AG.1.4	Applicant
AG.1.6	Applicant
AG.1.16	Applicant
AG.1.18	Applicant
AG.1.25	National Farmers Union
AQ.1.21	Applicant
AL.1.20	Applicant
AL.1.20	National Trust
CH.1.1	Applicant
CH.1.11	Applicant
EC.1.6	Applicant
CA.1.25	Applicant
CA.1.26	Applicant
CA.1.43	PFA Consulting on behalf of The Amesbury Property Company Limited (APC) and Classmaxi Limited (CML)
CA.1.45	Countryside Solutions on behalf of Beacon Hill Land Limited
CA.1.45	Applicant
DCO.1.4	Applicant
DCO.1.31	Applicant
DCO.1.32	Applicant
DCO.1.40	Environment Agency
DCO.1.95	Applicant
DCO.1.95	National Trust
DCO.1.99	Applicant
DCO.1.104	Applicant
DCO.1.106	Applicant
DCO.1.107	Environment Agency
FG.1.1	Applicant
FG.1.10	Applicant
FG.1.11	Applicant
FG.1.14	Applicant
FG.1.17	Applicant
FG.1.20	Applicant
FG.1.21	Applicant
FG.1.22	Wiltshire Council
FG.1.25	Applicant
FG.1.30	Applicant
FG.1.32	Environment Agency
FG.1.37	Applicant
FG.1.39	Environment Agency
FG.1.41	Applicant
HW.1.12	Applicant
HW.1.15	Applicant
HW.1.18	Applicant
LV.1.9	Applicant

Question	Responder Name
NS.1.2	Applicant
SE.1.10	Applicant
SE.1.22	Applicant
SE.1.23	Applicant
SE.1.30	Applicant
SE.1.34	Jonathan Morris
TR.1.10	Applicant
TR.1.20	Cycling Opportunities Group for Salisbury