

From: [REDACTED]
To: [A303 Stonehenge](#)
Subject: National Trust: Deadline 4 Submission
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Attachments: [image001.png](#)
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Please find attached the National Trust submission for Deadline 4.

Kind regards
Nick



**National
Trust**

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**National
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SWRoads.Enquiries@nationaltrust.org.uk

Your ref: TR010025

Our ref: ID no. 20020498

21 June 2019

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sir/Madam

Application by Highways England for an Order Granting Development Consent for the A303 Amesbury to Berwick Down (Stonehenge) scheme

DEADLINE 4

Please find hereunder the National Trust's response in respect of relevant items detailed under item 12 (Deadline 4) of the Examination Timetable as included in the ExA's Rule 8 letter.

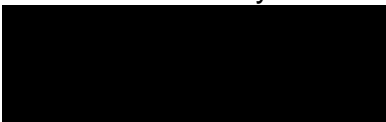
Enclosed includes the National Trust's:

- Written summaries of oral submissions put at hearings held between 4 and 14 June 2019

Comments on the OEMP (provided at Deadline 3)

It is anticipated that the Applicant will provide an updated version of the OEMP at this deadline (Deadline 4). The Trust will therefore seek to make comments on this version (or intermediary versions thereof), in anticipation of progress being made and reflected in the document, through the ongoing discussions between stakeholders. The Trust is seeking further commitments to be set out in the OEMP by the close of Examination.

Yours faithfully



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National
Trust

**Written summaries of oral submissions
put at hearings held between 4 and 14 June 2019**

TR010025

Amesbury to Berwick Down (Stonehenge)



June 2019

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1. Issue Specific Hearing 1: Draft Development Consent Order

1.1 Agenda item 3.3iv

Article 2 – Interpretation – construction compounds works

1.1.1 The Trust stated a point in relation to confirmation that no main construction compounds would be within the WHS. The ES has assessed construction compounds outside of WHS, but absolute clarity was sought on the commitment for no construction compounds within the WHS.

1.2 Agenda item 3.5

Article 7 – Limits of Deviation

1.2.1 The Trust stated that it would be important to secure HMAG consultation on any proposed use of LoDs.

1.2.2 The Trust stated a need for clarity on the assessment of impacts of any proposed use of LoDs.

1.3 Agenda item 3.6

Article 12 – Access to works

1.3.1 The Trust stated our understanding that within the WHS haul roads will be contained within the footprint of the final construction, and there will be no creation of additional haul routes across the WHS. The Trust sought a reference for clarity on this matter.

1.4 Agenda item 3.8

Article 14 – protective works to buildings

1.4.1 The Trust stated a request for appropriate consultation to ensure that should the need arise for protective works to be carried out at Stonehenge Cottages there would be no impacts of these works on archaeological assets within this area (including the directly adjacent Scheduled Monuments of New King Barrows).

1.5 Agenda item 3.9

Article 15 – Authority to survey and investigate land

1.5.1 The Trust stated the level of consultation is a matter of concern with regard to our landholding, due to potential impacts on OUV of any intrusive works. We requested specific provision for appropriate consultation.

1.6 Agenda item 3.14

Temporary use of land for constructing the development

1.6.1 The Trust stated the location of a small construction compound (lay down area) on Trust land (Plot 5-37), which we would seek appropriate consultation about any use.

1.7 Agenda item 4.2

Requirement 3(1) and (2) – preparation of detailed design etc

1.7.1 The Trust stated the OEMP has been updated with an important new section (section 4) which includes mechanism for consultation on some areas of detailed design. Adequate and consistent consultation on matters of detail is a key concern for the Trust and we will endeavour to work with the Applicant to develop this within the OEMP.

1.8 Agenda item 4.3i

Requirement 4 – OEMP

Whether the proposed means of securing implementation, adherence to and enforceability of the preliminary works Construction Environmental Management Plans (preliminary works CEMPs), the Construction Environmental Management Plans (CEMPs), the management plans included within the CEMPs and the Handover Environmental Management Plans (HEMPs) ultimately by way of compliance with the OEMP [APP-187] and Requirement 4, subject to enforcement by Wiltshire Council, would be satisfactory?

1.8.1 The Trust stated that the Applicant as ‘authority’ would have the ability to authorise variations from outline plans. This is a concern as it may allow dilution of agreed principles.

1.9 Agenda item 4.3v

Requirement 4 – OEMP

Whether there should be provision in the dDCO for a process of approval of details of surfacing materials and fencing including from heritage

consultees in line with an agreed and approved set of design and construction principles?

- 1.9.1 The Trust stated that in our Written Representation we had already expressed concerns that detailed design may have adverse impacts on the OUV of the WHS. Therefore provision for consultation on detailed design involvement, and relevant opportunity to respond as landowner was required.
- 1.9.2 The Trust stated it considers it is very important that there is a 'feedback loop' with key consultees to enable issues that may emerge during construction to be resolved.

1.10 Agenda item 4.7

Requirement 8 - Landscaping

- 1.10.1 The Trust stated an amendment to Requirement 8 to clarify all hard landscaping should be included. And further suggested discharge of the landscaping scheme in Requirement 8, requires the inclusion of consultation members of HMAG to ensure consistency from the OEMP through to discharge of requirements.

1.11 Agenda item 4.9

The consolidated list of suggested Requirements with reasons proposed by Wiltshire Council as set out in Appendix B of the Local Impact Report (LIR) [REP1-057] relating to: (i) Archaeology and WHS considerations; (ii) local transport; (iii) Public Rights of Way (PROW); (iv) ecology and landscape; (v) built heritage; (vi) public health and protection; and (vii) flood risk and drainage.

- 1.11.1 The Trust stated that in terms of requirements put forward by Wiltshire Council, that those should equally reflect a level of consultation with others (e.g., other members of HMAG), where that is also already committed in the DAMS and OEMP, or where that commitment is currently being sought.

2. Issue Specific Hearing 2: Cultural heritage

2.1 Agenda item 3 – Policy and Guidance

- 2.1.1 The Trust stated that we had taken consideration of ICOMOS/UNESCO 2011 Guidance on Heritage Impact Assessments in Cultural World Heritage Sites

when undertaking our own assessments. Our view is that the ICOMOS guidance calls, in a number of places, for a balanced approach to assessing the impacts on the OUV of the WHS.

2.1.2 That being said, in reference to a remark from an Interested Party about major harm being avoided – we confirmed we shared that view, and went further, considering even a moderate impact on OUV to be unacceptable. We also stated that in applying the balanced approach required by the ICOMOS Guidance we took the view that it was possible for impacts on a particular attribute to be so severe as to render a scheme unacceptable.

2.1.3 The Trust stated that mitigation had been put in place within the design of the scheme as presented to ensure there would be no moderate (or greater) adverse impacts on OUV.

2.2 Agenda item 6.v

Effect of elements of the proposed development on Cultural heritage assets and their settings - cut and cover tunnel and bored tunnel.

2.2.1 The Trust stated that the Tunnel Protection Zone was a point of concern, and that discussions were ongoing with the Applicant. Restrictive covenants to be imposed in the Tunnel Protection Zone are defined only by the dDCO wording “such rights as the Applicant considers necessary” and that subsequent description of them to date is not binding on the Applicant.

2.3 Agenda item 6.vii

Effect of elements of the proposed development on Cultural heritage assets and their settings – Countess Flyover

2.3.1 The Trust stated the proposed flyover at the Countess Farm Complex will impact on the Grade II listed buildings within this complex. The Trust restated our need to secure consultation on design aspects of this element of the scheme.

2.4 Agenda item 7

Detailed Archaeological Mitigation Strategy (DAMS) and associated documents

2.4.1 The Trust commented on mitigation methods in relation to sampling strategies. We would support the idea that for humanly cut or made archaeological features there should be a ‘100% sampling strategy during excavation’. In regards to plough zone scatter sites of Neolithic and Early Bronze Age date they contribute to OUV, and so it is important to regard

material from scatters as complementary to humanly made features. We would support a fresh look at an 'intelligent sampling strategy' to regard them holistically along with archaeological features.

2.5 Agenda item 7.i

Detailed Archaeological Mitigation Strategy (DAMS) and associated documents – Content: Archaeological narrative, identification of archaeological sites and their description, scheme impact, and the mitigation proposed.

- 2.5.1 The Trust stated discussions are ongoing with the Applicant in relation to development of the DAMS.
- 2.5.2 The Trust stated there is no mechanism outlined indicating how, in practice, the 'feedback loop' from HMAG to the Archaeological Clerk of Works would work. Having clarity about how such a process would work, rapidly and effectively is critical to preventing unintended harm to the WHS. This should be secured in the DAMS.

3. Issue Specific Hearing 3: Landscape and visual effects and design

3.1 Agenda item 7 – Arboriculture

- 3.1.1 The Trust reiterated that the ongoing discussions, in relation to tree planting at the Countess Farm Complex, also involve archaeological mitigation.

3.2 Agenda item 8.i – Design

The need for an overall vision in such an important scheme and the need to consider the detailed design of critical aspects at an early stage.

- 3.2.1 The Trust stated that we are encouraged by the recent update to the OEMP and the direction of travel of the document concerning the 'design principles'. However much more work needs to be done and discussions are ongoing.
- 3.2.2 The Trust stated points already heard throughout the day and in previous hearings that the dDCO, OEMP, all the way to what is being discharged needs to have a level of consistent consultation.

4. Issue Specific Hearing 4: Flood risk, groundwater protection, geology, waste (etc)

4.1.1 The Trust did not make representations at this hearing.

5. Issue Specific Hearing 5: Noise and vibration, health and wellbeing

5.1 Agenda item 5.i

Noise impacts and mitigation measures during the construction and operational periods – Countess roundabout, flyover, slip roads.

5.1.1 The Trust made a submission that due to the setting of listed buildings at the Countess Farm Complex we seek to be consulted on design aspects of the scheme at this location. This should be secured in the OEMP.

5.1.2 The Trust stated that discussions with the applicant are ongoing in relation to additional tree planting (for visual mitigation) at the Countess Farm Complex, the Trust welcomes this, subject to agreement on archaeological mitigation requirements.

5.2 Agenda item 5.iii

Noise impacts and mitigation measures during the construction and operational periods – Tunnel portals and cuttings leading to them

5.2.1 The Trust stated that the intention for noise reflective/absorbative materials for cutting wall surfaces was unclear as set out in the OEMP, and sought further definition.

5.3 Agenda item 6.i

Vibration impacts and mitigation measures during the construction and operational periods – Stonehenge Cottages

5.3.1 The Trust stated we are not anticipating impacts of the magnitude that would require re-housing. And that our present understanding is that the Applicant has committed to undertake condition surveys. The Trust stated a request for appropriate consultation to ensure should the need arise for protective works to be carried out at Stonehenge Cottages that there would be no impacts of these works on archaeological assets within this area. It was stated condition surveys are also being discussed at the Countess Farm Complex, with particular regard for 'staddle stone buildings'.

5.4 Agenda item 7.iii

Effects on wellbeing and public sector equality duty – Access to WHS

5.4.1 The Trust responded to a question from an Interested Party regarding a 'visitor survey', we referred to our previous response at Deadline 2.

6. Issue Specific Hearing 6: Traffic and transportation

6.1 Agenda item 4.9

Public rights of way (PRoW) – omission of link for motorised users along route of existing A303 between AMES11 and AMES12 from Proposed Development

- 6.1.1 The Trust stated our submission related to the scheme as presented by the Applicant on the day.
- 6.1.2 The Trust stated that our own assessment of the impacts on the OUV of the WHS indicates to us that (provided appropriate approach to design detail and delivery is secured) the scheme is acceptable.
- 6.1.3 The Trust stated, in response to a proposal from Wiltshire Council, that we would be supportive of a proposal to restrict all motorised users on byways 11 and 12. However if these proposals were to, in effect, permit motorcycles, further information would be required to make an assessment. The Trust is mindful of Policy 6b of the World Heritage Site Management Plan and this may, however, be seen as beneficial progress.
- 6.1.4 The Trust stated it would not support a link for motorised vehicles along the line of what would become the decommissioned A303 (i.e., creating a link for vehicles between byways 11 and 12). Our current impact assessment show this could have a detrimental and unacceptable impact on OUV, and therefore would negate many of the beneficial impacts on OUV flowing from the removal of traffic from this area (as presented within the scheme submitted by the Applicant). The Trust did not address different types of motorised vehicles in this regard, but would seek to understand and clarify the details of the proposals from other parties should they come forward.

6.2 Agenda item 4.16

Additional Item – Stonehenge Road proposed closure point

6.2.1 The Trust stated in response to submissions by an Interested Party at the hearing, the Trust has not assessed alternative proposals for this, and our position is based on the scheme as presented in the application. In regards

this alternative proposal, we reserve our position to comment on any implications for Trust as landowners, and to the effects on the WHS.

6.3 Agenda item - Additional

Additional item – Legal implications of Wiltshire Council proposals for changes to the DCO to restrict motorised vehicles on byways AMES11 and AMES12

- 6.3.1 The Trust stated that this proposal was a matter of significant importance to us, and that we would reserve further comment until the information requested by the ExA for deadline 4 was published.

7. Issue Specific Hearing 7: Biodiversity, biological environment and ecology

7.1 Agenda item 6.1

Overall effects of the scheme on biodiversity – effectiveness of measures to secure long term management of calcareous grassland etc to maximise gains in biodiversity

- 7.1.1 The Trust stated the position that the creation and reestablishment of chalk grassland habitat in this landscape is important and that the Trust landholding purposes include promotion of biodiversity. Undertaking chalk grassland reversion is entirely compatible with archaeological protection. Improvement of habitat connectivity as part of scheme is something we recognise as an important benefit.
- 7.1.2 The Trust stated a requirement for a consistent level of consultation on these matters to be secured through the OEMP (which ties back to Requirement 8 of the dDCO to achieve purposes).
- 7.1.3 The Trust stated that as landowner it is in a good position to deliver appropriate land management (e.g., grazing) to establish and maintain chalk grassland being established.
- 7.1.4 The Trust stated that scrub is a matter of particular concern regarding potential damage to archaeological assets and impacts on OUV, so it is important that it is appropriately managed and that ongoing management is secured.