



A303 Amesbury to Berwick Down Case Team

National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

19 July 2019

Dear Sir/ Madam,

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

References: TR010025 - 20019871

Deadline 5 Submission

As referred to in our Written Representations, the Historic Buildings and Monuments Commission for England is generally known as Historic England. However, due to the potential for confusion in relation to “HE” (Highways England and Historic England), we have used “HBMCE” in our formal submissions to the examination to avoid confusion.

As set out in our Written Representations we are the Government’s statutory adviser on all matters relating to the historic environment, including world heritage.

We have now reviewed the various documents that have been submitted to the Examining Authority for Deadline 4 and Deadline 4A. As a consequence of that review we make the following observations and submissions on those documents as our Deadline 5 submission.

Deadline 4

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

As the Examining Authority will be aware we submitted written summaries of our oral submissions at the Issue Specific Hearings at deadline 4. At those sessions we sought to focus on the questions within the relevant Issue Specific Hearings to assist and inform the Examining Authority’s understanding of the implications for the historic environment arising from the Scheme without repeating the points made in our Written Representations. Where it was appropriate to do so, we provided some context for our responses together with relevant reference to documentation that had already been submitted to the Examination. We also, where it was appropriate to do





so, provided some context for our responses in light of comments/observations raised by other Interested Parties. We provided our responses in relation to Issue Specific Hearing (ISH) 2 – Cultural Heritage; ISH 3 – Landscape and visual effects and design; ISH 4 – Flood risk, groundwater protection, geology, land contamination, waste and materials management; ISH 5 Noise and vibration, health and wellbeing and ISH 6 – traffic and transportation. Consequently we have no further comments to make at this time except to confirm that discussions between ourselves and Highways England and other parties remain on-going and this will include discussions on information, such as the provision of additional visualisations, that have been and are being submitted.

We would also note that although we expected to be in a position to provide an updated Statement of Common Ground in advance of Deadline 5, this has not proved possible. However good progress has been made in discussions and we will update the Examining Authority at Deadline 6.

Written notes establishing the legal position of Wiltshire Council, the Trail Riders Fellowship and the Applicant in respect of proposed changes to the dDCO

Please note that we responded to these submissions as was required by Deadline 4A – please see further our commentary in relation to Deadline 4A below.

An updated version of the dDCO

Deadline 4 required the submission of written summaries of oral submissions put at the hearings held between 4 and 14 June. As part of those submissions, we included a detailed review of the d2DCO. As stated in our submissions, there are a number of issues that have been raised regarding the d2DCO as currently drafted. These range from the detailed commentary on interpretation and the works provisions through to the general approaches being taken, possible unintended consequences for the historic environment, and an overarching commentary on the extent of our engagement in the sign off of documents. Our submission coincided and crossed with the updated version of the dDCO that Highways England also submitted on 26 June at Deadline 4. We have now had an opportunity to review that document and note that an updated version of the dDCO is due to be submitted on 26 July. We would hope that our submissions will have been taken into account in this updated version. We will review and provide the Examining Authority with commentary on this in due course.

Some of the issues we raised in relation to the d2DCO intersect with the development of the DAMS and the OEMP as well as other documentation being produced under the Scheme. The resolution of these issues requires a number of different discussions to draw to a conclusion. The discussions have resulted in further clarification and revisions to the DAMS and similarly additional consultation on the Design Principles incorporated in the OEMP. We are working with Highways





England regarding these documents in light of the updated versions being submitted on 26 July to incorporate as many of our comments as possible before this deadline. We will then review and provide the Examining Authority with commentary on the updated versions of these documents in due course.

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

We note that within the Land Acquisition and Temporary Possession Negotiations Schedule that under item no7 there are number of plots of land which are the subject of acquisition. There will need to be a discussion with Highways England on the matter and we will provide an update to the Examining Authority in due course.

Deadline 4A

Comments on legal positions established at Deadline 4 in respect of proposed changes to the dDCO

We provided our comments on the submissions made by Highways England, Wiltshire Council and the Trail Riders Fellowship on 05 July. We have no further comments to make on the matters addressed in that submission at this time.

Publication of The ExA's Written Questions (if required)

We note that the deadline for responses to the Examining Authority's Written Questions is 26 July and expect to submit our responses to those questions in accordance with that deadline.

Yours faithfully,



Dr Helen Woodhouse
Team Leader – Development Advice
Historic England, South West Office

