

2nd October 2019

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Your ref: TR010025

Our ref: A303-AFP022 Final Response to ExA
02.10.19

Dear Ms McKay

Re: A303 Amesbury to Berwick Down (TR010025) – Wiltshire Council Final Submission to Examination

Further to the publication of the Rule 8(3) letter for the above referenced scheme on 8th August 2019, Wiltshire Council's final response in advance of the Close of Examination (Deadline 10) is set out below and in the attached.

Final Submission

The Council submits the following documents into Examination in advance of Deadline 10:

- Comments on Deadline 9 Submissions
- Closing Statement

These have been included as separate documents to this submission.

Statement of Common Ground (SoCG) with Highways England

The final version of the Statement of Common Ground between Highways England and Wiltshire Council is in the process of being agreed and signed by both parties. Both parties are using their best endeavours to enable this to be submitted by Highways England prior to the close of the Examination.

Wiltshire Council's Legal Agreements with Highways England

Following notification at Deadline 9 that Highways England and Wiltshire Council had agreed the content of the legal agreement between the parties relating to highways matters, the Council is pleased to inform the ExA that this agreement has now been signed by HE and will be sealed by the Council shortly. Therefore, this agreement should be considered to be concluded.

The Council is also in the process of finalising its Planning Performance Agreement with Highways England. The Council is confident that a final, signed agreement will be in place shortly.

I trust that the information above and in the attached is helpful to confirm Wiltshire Council's final position in relation to this Scheme at the Close of Examination. However, if you require any further information at this stage, please do not hesitate to contact me.

Yours sincerely,



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A303 Amesbury to Berwick Down (Stonehenge) Wiltshire TR010025

Wiltshire Council (A303-AFP022) Response to Deadline 9 Submissions

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1. Introduction

- 1.1 Wiltshire Council has reviewed the Deadline 9 submissions. The Council's response to selected submissions is contained herein.
- 1.2 These comments, together with those made in the Council's Closing Statement, should be taken as the Council's final position on the proposed Scheme for the purpose of determining the DCO Application.

2. Comments on (Rev 7) Draft Development Consent Order [REP9-004]

- 2.1 The Council has reviewed the (Rev 7) Draft Development Consent Order (dDCO) [REP9-004].
- 2.2 The Council welcomes the inclusion of an additional Requirement (12) regarding Stone curlew breeding plots. The Council can confirm that its outstanding issues relating to Stone Curlew and the impacts on European Sites (Salisbury Plan SPA and River Avon SAC) have been addressed so that there is sufficient confidence going forward that all impacts on European Sites can be adequately mitigated and that there will be a process in place to secure the necessary mitigation.
- 2.3 The Council has agreed with HE that the following changes will be incorporated into the final version of the dDCO, to be submitted prior to the close of the Examination.
- 2.4 The Council notes the revisions to the definition of "*commence*" and introduction of the "*preliminary works*" definition within Part 1, Preliminary, Interpretation (2) and subsequent removal of the "*preliminary works*" definition within Interpretation (1) in Schedule 2. Following discussions between the Council, Historic England and HE, the Council can confirm that it is content for point h) "*the erection of construction plant and equipment*" to be removed from the "*preliminary works*" definition in Part 1, Preliminary, Interpretation (2), provided that the "*commence*" definition remains as drafted and the amendments to PW-G1 in the OEMP are made as outlined in paragraph 3.3 below. This is to ensure clarity that only the "*erection of construction plant and equipment for the preliminary works*" is excluded from the definition of "*commence*", and that the "*erection of construction plant and equipment*" associated with the main works would be caught by the definition of "*commence*".
- 2.5 The Council welcomes the inclusion of a definition for "*shared use cycle track*". However, at Schedule 1, Ancillary Works, (b) (iii), the Council noted there were references to both "*cycle tracks*" and "*shared use cycle tracks*". The Council considered that the reference to "*cycle tracks*" should be removed as there were no other references to "*cycle tracks*" within the dDCO and it was not a defined term. Section (b) (iii) of Ancillary Works in Schedule 1 would therefore be amended to state: "*comprising ramps, steps, footpaths, footways, ~~cycle tracks~~, shared use cycle tracks, cycleways, bridleways, equestrian tracks, non-motorised user routes or links, byways open to all traffic, restricted byways, private means of access, laybys and crossing facilities;*".
- 2.6 Reference 38 within Schedule 3, Part 3 will be amended as follows: "*To be substituted by a new private means of access to land on the east side of the realigned Allington track link, 410 metres south east of the **existing** junction of the **improved** A303 with the Allington Track*". The Council considered this change was necessary as the use of the word "improved" was thought to be misleading as there will be no junction from the improved A303 with Allington Track. The amendment will also be applied to Reference 39 within Schedule 3, Part 3.

- 2.7 Provided these changes are made within the final version of the dDCO and there are no other changes to the document, the Council can confirm that it is content with the dDCO as drafted, with the exception of the non-inclusion of the ExA's suggested changes and three issues relating to the incorporation of the non-material changes into the dDCO as illustrated below.
- 2.8 The Council remains fully supportive of the ExA's suggested changes to the dDCO and considers that the following changes should be made:
- a) Removal of the words "*or convenient*" from Article 7(2), (3), (4), (5) and (7)
 - b) Proposed additions in Article 13 (5) due to the sensitivity of the groundwater in this area
 - c) Extension of the notice period in Article 29 (2) to 28 days
 - d) Inclusion of a new sub-paragraph in Requirement 4 regarding hydrological effects on Blick Mead
 - e) Inclusion of a new Requirement regarding permitted development rights that includes both Part 9 Class B (development relating to roads) and Part 16 Class D (communications).
- 2.9 With regard to the proposed Requirement relating to permitted development rights, in addition to the Council's comments in its Response to ExA Published Documents [REP9-034], the Council would like to further support the ExA's approach to this issue as the ExA's wording appears to be binding thereafter in relation to permitted development rights, whereas in HE's proposed approach to this issue in Article 6 (3), it does not appear to restrict HE or the Department for Transport from exercising these rights once the authorised development was completed.
- 2.10 Please note that the list above differs from the Council's previous representations due to Wiltshire Council's acceptance of HE's approach with regard to the "*erection of construction plant and equipment*" as outlined in paragraph 2.4 above. It also does not include those items which HE have incorporated into their dDCO.
- 2.11 The Council acknowledged that further changes were required following the ExA's procedural decision dated 27th September [PD-021] to accept all eight non-material changes into Examination as described in HE's Proposed Changes Position Statement [REP9-027]. The Council can confirm that it is content with the following changes:
- a) Work No. 3. (a) (ii) in Schedule 1 which includes the following text: "***closure of an existing lay-by, and including the***"
 - b) Work No. 6 (a) in Schedule 1, which includes: "***and including the provision of a new turning head at the junction between Stonehenge Road and footpath AMES13;***"
 - c) Reference UA in Part 1 of Schedule 3, which has been amended as follows: "A new length of new ~~restricted byway~~ ***shared use cycle track*** from a point ~~35~~ ***45*** metres east..."
 - d) New insertion of Reference 41 in Part 3 of Schedule 3 to state: "***New private means of access to field from the south side of the new Allington Track link, 362 metres south west of the junction of the existing A303 with the Allington Track. (as shown on sheet 11 of the rights of way and access plans)***"
 - e) Change in Reference 34 in Part 3 of Schedule 3 to state "***885 metres south of Airman's Corner***" instead of "*905 metres*"

- f) New paragraph 21 at Schedule 9, Part 7, which states:

“A 245 metre length of existing A303 trunk road

21. A length of approximately 345 metres of highway, comprising the existing A303 circulatory carriageway (and related highway verge) at Countess junction roundabout to be re-classified as the A345, together with the following connecting lengths of slip road-

(a) a 14 metre length of the existing A303 eastbound diverge slip road to be re-classified as part of the A345, commencing from the edge of the circulatory carriageway and extending in a westerly direction;

(b) a 17 metre length of the existing A303 eastbound merge slip road to be re-classified as part of the A345, commencing from the edge of the circulatory carriageway and extending in an easterly direction;

(c) a 25 metre length of the existing A303 westbound diverge slip road to be re-classified as part of the A345, commencing from the edge of the circulatory carriageway and extending in an easterly direction; and

(d) a 26 metre length of the existing A303 westbound merge slip road to be re-classified as part of the A345, commencing from the edge of the circulatory carriageway and extending in a westerly direction.

As shown by a pink line on the classification of roads plan”

- g) Amendment to paragraph 23 (formerly paragraph 22) at Schedule 9, Part 9 to state:
“A 2.28 kilometre length of the existing A303 trunk road. A length of approximately 2.28 ~~km~~ kilometres of the existing A303 trunk road from point A on sheet 1 of the de-trunking plans, being a point on the A303 trunk road 900 metres west of its junction with the B3083 north, in an easterly direction (including the lay-by on the north side of the existing A303, west of Winterbourne Stoke) to point B...”

2.12 However, the Council considers that amendments are required to the following three areas:

- a) The Council considers that Work No. 4 (f) in Schedule 1 should be amended to reflect that the northern part of this route is to be made a shared use cycle track. The Council suggests that the wording is amended as follows: ***“the construction of a new ~~restricted byway~~ right of way, partly shared use cycle track and partly restricted byway, running southwards...”***
- b) In Schedule 9, Part 7, paragraph 18, the Council considers that the phrase ***“reclassified as an unclassified road”*** does not convey the correct meaning. The A303 is classified and it will become declassified. The wording should be replaced with that in AS-067, ***“A 595 metre length of the existing A303 trunk road to the west of Winterbourne Stoke to be ~~de-classified reclassified as the C507~~ from a point immediately west of its junction with the existing southern B3083 in a westerly direction”***
- c) In Schedule 9, Part 9, the new paragraph 24 is a significantly different description than that stated in AS-067. It is more comprehensive, but in doing so the Council considers that this should include reference to the footway links on the east and west sides of the roundabout. The Council suggests that the following text is included: ***“A length of approximately 345 metres of highway, comprising the existing A303 circulatory carriageway (and related highway verge **and footway links on the east and west sides of the A345 route**) at the Countess junction roundabout, together with the following connecting lengths of slip road-”***

- 2.13 The Council requests the ExA take the above into account when making their recommendation on the final text of the documentation.

3. Comments on (Rev 6) Outline Environmental Management Plan [REP9-014]

- 3.1 The Council has reviewed the (Rev 6) Outline Environmental Management Plan (OEMP) [REP9-014].
- 3.2 The Council has agreed with HE that the following changes will be incorporated into the final version of the OEMP, to be submitted prior to the close of the Examination.
- 3.3 In order to provide sufficient comfort to the Council with regard to the erection of construction plant and equipment for the preliminary works, the following text will be added into PW-G1: ***"The preliminary works contractor (all) shall prepare a CEMP for their works (including any erection of construction plant and equipment for those works), as applicable to the scope of their contract, and receive the acceptance of the Authority and ultimately the approval of the Secretary of State, prior to the commencement of the contractor's works..."***.
- 3.4 In MW-WAT10 c), the text will be amended to state: *"The groundwater level and water quality monitoring / telemetry and reporting programme during construction and for a period of one year post ~~road opening~~ **tunnel opening to traffic.**"* This to resolve any ambiguity given that the Scheme is proposed to open in two phases and "road opening" could apply to any / either phase.
- 3.5 The Council considered that the Deadline 9 placement of parentheses in section 4.5.17 implied that The Authority was the adopting authority. The text in 4.5.17 will be amended as follows: *"The design of key elements of the scheme set out at 4.5.3 and 4.5.4 above to be adopted by **an authority authorities (the "adopting authority")** other than The Authority ~~(the "adopting authority")~~ shall, following the consultation process with the SDCG set out in this section 4.5, be agreed by the Authority with the adopting authority."*
- 3.6 The Council also understands that the words **"or affecting"** the WHS will be inserted into items PW-CH4, MW-CH9, D-CH14 and MW-GEO7 so that it would state *"within or affecting the WHS"* in line with previous additions included within the Deadline 9 version.
- 3.7 In order to ensure that archaeological investigation at portals did not commence until the portal locations are known with precision, the following text will be included within PW-CH5: ***"No archaeological mitigation works shall take place in the footprint of the scheme between chainages 7+200 and 7+400 at the western portal and between chainages 10+400 and 10+430 at the eastern portal (under Article 7(7)(b) of the DCO) until the tunnel portal locations are confirmed by the Authority"***.
- 3.8 Provided these changes are made within the final version of the OEMP and there are no other changes to the document, the Council can confirm that it is content with the OEMP as drafted, with the exception of the non-inclusion of the pollution control valve text. This issue is summarised below and marked as "Not Agreed" within the Council's Statement of Common Ground (SoCG) with HE. The Council would ask the ExA to take this into account when making their recommendation on the final text of the documentation.

- 3.9 As expressed in previous submissions and in oral representations at the Issue Specific Hearings, the Council considers that the pollution control systems for the tunnel should be automated as far as possible. The Council requested that the following wording was included within a separate item in the OEMP:

“Pollution control systems

The tunnel drainage strategy contains systems for pollution control and we would request that these systems are automated where practicable to reduce the reliance on manual operation.

The control of the system must be designed to mitigate against potential environmental impacts for spillage or incident and prevent discharging of any contaminants off site or to the environment.

This control should include failsafe’s and backup power supplies for both switching, valves and pumps, and should be linked to appropriate warning, signage and directly to a control room.

We understand that the detailed design is not available, however it would be useful to have the design parameters as soon as they are available for comment.

The requirements and the design parameters of the pollution control systems should be included in the OEMP to ensure that both the EA and Wiltshire Council are satisfied that all aspects of the design have been considered and agreed.”

- 3.10 Unfortunately, the Council / the Environment Agency and Highways England have not been able to reach agreement regarding the inclusion of the above, or similar wording reflecting the intent, within the OEMP. The Council is pleased to note, however, that HE have committed to producing a single overarching document that brings together all information into one place for ease of reference (row 3.28.23 of the Council’s SoCG with HE).

4. Comments on (Rev 5) Draft Detailed Archaeological Mitigation Strategy [REP9-018]

- 4.1 The Council has reviewed the (Rev 5) Draft Detailed Archaeological Mitigation Strategy (DAMS) [REP9-018].

- 4.2 At Deadline 9, the Council indicated that it was very close to agreeing the few outstanding items on the DAMS with HE. The Council is pleased to confirm that HE have agreed to make the following changes and that they will be included within the final version of the DAMS to be submitted into Examination.

- 4.3 Immediately following paragraph 1.3.2 in the DAMS, the following paragraph will be added to provide greater clarity on roles:

“In addition to Wiltshire Council’s membership of HMAG, Wiltshire Council also has a statutory role in relation to archaeological works for the entire Scheme for the local planning authority and statutory responsibility for sign off of Archaeological works and approval of Site Specific Written Schemes of Investigations (SSWSIs), Heritage Management Plans (HMPs) and Method Statements MS).”

- 4.4 In order to prevent archaeological investigation at portals commencing until portal locations are known with precision, the following wording will be added at 5.2.4:

“No archaeological mitigation works shall take place in the footprint of the scheme between chainages 7+200 and 7+400 at the western portal and between chainages 10+400 and 10+430 at the eastern portal (under Article 7(7)(b) of the DCO) until the tunnel portal locations are confirmed by the Authority.”

- 4.5 In order to align the wording at paragraph 5.2.25 with the OEMP, it will now state:

“Within the WHS, the existing A303 would be converted to a restricted byway accessible to pedestrians, wheelchairs and mobility scooters, cyclists, equestrians and horse drawn carriages. This restricted byway would extend along the stopped-up section of Stonehenge Road and would comprise a ~~bound~~ surface that is appropriate for use and location adjacent to chalk grassland habitat (see 5.2.21 above; Table 11-4 and Appendix D). A turning head would be provided to allow vehicles to turn immediately south east of the point where the existing Stonehenge Road will be converted to a new restricted byway (NMC-04).”

- 4.6 The “Science Advisor” title at paragraphs 6.3.70, 6.7.4 and 6.7.8 will be amended to “**Regional Science Advisor**”.

- 4.7 The Council also understands that as a consequence of the acceptance of the non-material changes into Examination, the following changes will be made:

- a) NMC-04: Figure 12.1 has been amended. Text has also been inserted at 5.2.25 as outlined in paragraph 4.5 above. The inset figure has been updated in Appendix D (Site 56) and the following text inserted: ***“with a turning head provided to allow vehicles to turn immediately south east of the point where the existing Stonehenge Road is converted to a new restricted byway.”***
- b) NMC-05: Sites 19 and 56.1 have been amended in Figure 12.1. In Appendix D (Site 19) the inset figure has been updated and the following text inserted: ***“The site includes a link between the realigned A360 (Site 19) and the new restricted byway (Site 36) northwards, which also provides a PMA allowing farm vehicles to cross the new A360 to the restricted byway (Site 56.1) in a single movement”***.
- c) NMC-06: Figure 12.1 has been amended. In Appendix D (Site 36), the inset figure has been updated and the following text inserted: ***“North of Longbarrow Roundabout (and within the WHS from where the re-aligned A360 North ties into the existing carriageway) a new NMU route (restricted byway) will be provided along the eastern side of the A360 to the Stonehenge visitor centre. Within the boundary of the visitor centre, the NMU would be a shared-use cycle path, 1.5m wide, routed to the east of the dew pond.”***
- d) NMC-07: Figure 12.1 has been amended. Text has also been inserted at 3.3.96 to state: ***“and private means of access into adjacent land”***. The inset figure has been updated in Appendix D (Site 33) and the following text inserted: ***“Allington Track will be linked to Equinox Drive within Solstice Park by a new length of highway 5.5 metres wide with passing places and a PMA into Earl’s Farm Down (south side of the link)”, “(north side)” and “A private means of access on to Earl’s Farm Down from the link between AMES 1 byway and Allington Track (south side) will be formed above existing levels to ensure preservation of remains associated with non-designated ring ditches forming part of the Earl’s Farm barrow group.”***

- 4.8 The Council can confirm that provided these changes have been made in the final version of the DAMS, and there are no other changes to the document, then with the exception of the issue highlighted below, the Council is content with the drafting of the DAMS.
- 4.9 The Council has noticed that the list of attendees contained in paragraph 8.3.2 should also contain “**Wiltshire Council**” and “**Historic England**” as separate bullet points. The Council would ask the ExA to take this into account when making their recommendation on the final text of the documentation.

5. Comments on M&R Hosier Response to Deadline 8 Submissions [REP9-039]

- 5.1 The Council has reviewed M&R Hosier’s Response to Deadline 8 Submissions [REP9-039] and wishes to make the following comments.
- 5.2 In Section 11.1.8 on page 12, M&R Hosier’s response to 8.49 poses questions about the camera monitoring of Byways 11 and 12, who carried out the monitoring (also referred to as surveys) and its purpose. The text states:

“At Issue Specific Hearing 6 the Applicant stated that static cameras had been used to monitor byways 11 and 12 for motorbike use. We were also told that on a number of occasions, the cameras had been removed or pointed in different directions away from the byway. If the exercise had been about the disturbance of Stone curlews due to increased recreational use, RSPB would have been informed about the surveys so they could give guidance on where the cameras need to be placed. RSPB have no knowledge of surveys along the byway in relation to the recreational use and disturbance to Normanton Down Reserve. As well as the information recorded by the cameras, ground surveys need to be carried out: Users of the byways should be asked about the reason for their visit, how long it would last for, and whether or not they would be accompanied by dogs. This suggests that the Applicant is trying to do surveys on the cheap and use one simplistic survey to cover a number of separate issues, i.e. byway use by 4x4’s, motorcycles, bicycles and pedestrians.

We have located one of the two cameras on Byway 12 in the southern section of the WHS. However, there are only two cameras on a long stretch of byway. We would further suggest, that from their positioning, the cameras would not be capturing data that would be appropriate for monitoring any disturbance on Normanton Down Reserve. For this to be possible, additional cameras would need to be located within the area.

Why has the Applicant not put the findings of the survey on the Inspectors website for everyone to see? Will they be added at a later date? If Wiltshire Council has carried out these surveys why has the footage of the cameras not been used to help tackle the antisocial behaviours on the byways? Information would be helpful to give Wiltshire Rural Crime Team information in relation to hare coursing and also to catch the persistent fly-tippers that use the byway.”

- 5.3 The Council wishes to make it clear that the camera surveillance was carried out entirely by Highways England, and to Wiltshire Council’s knowledge, specifically to record the volume, frequency and type of use by motor vehicles. The results made available to the Council were only in the form of the breakdown of the user numbers and types, which was submitted by HE into the public examination. Footage from the cameras has not been shared with Wiltshire Council. Whilst it may or may not be that additional information has been obtained which

would assist in monitoring disturbance on Normanton Down Reserve, or in relation to antisocial behaviour, hare coursing and fly-tipping, no such information has been made available to Wiltshire Council. The Council considers that the wider use of any information gathered by the cameras is a matter for HE as owners of the footage to consider.

6. Conclusion

- 6.1 Wiltshire Council's response to selected submissions made at Deadline 9 are outlined above.
- 6.2 These comments, together with those made in the Council's Closing Statement, should be taken as the Council's final position on the proposed Scheme for the purpose of determining the DCO Application.



A303 Amesbury to Berwick Down (Stonehenge) Wiltshire TR010025

Wiltshire Council (A303-AFP022) Closing Statement for Examination

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1. Introduction

- 1.1 The DCO Application for the A303 Amesbury to Berwick Down (Stonehenge) Road Improvement Scheme was accepted by the Secretary of State for Examination on 16th November 2018 and the 6-month Examination commenced on 3rd April 2019 and concludes on 2nd October 2019.
- 1.2 During the Examination, Interested Parties have made numerous submissions setting out their positions on a range of issues and these have been tested during a course of Issue Specific Hearings. The core Application documents, namely the draft Development Consent Order (dDCO), the Outline Environmental Management Plan (OEMP) and the draft Detailed Archaeological Mitigation Strategy (DAMS) have been substantially updated by Highways England (HE) to reflect these submissions.
- 1.3 As the Examination draws to a close, Wiltshire Council submits this Closing Statement, which sums up its position on the Scheme and its assessment of the final Scheme against the Objectives for the Scheme to assist the Examining Authority (ExA) and Secretary of State when coming to a decision on whether the Development Consent Order should be granted.

2. Wiltshire Council's Assessment Against Objectives for the Scheme

- 2.1 The Department for Transport (DfT) defined four objectives for the A303 Amesbury to Berwick Down (Stonehenge) Road Improvement Scheme, which were intended to address identified problems and to take advantage of the opportunities that new infrastructure would provide. The Objectives for the Scheme are:
 - **Transport** – To create a high quality reliable route between the South East and the South West that meets the future needs of traffic;
 - **Economic Growth** – To enable growth in jobs and housing by providing a free flowing and reliable connection between the South East and the South West;
 - **Cultural Heritage** – To help conserve and enhance the World Heritage site and to make it easier to reach and explore; and
 - **Environment and Community** – To improve biodiversity and provide a positive legacy for nearby communities.

Transport:

- 2.2 The Scheme's primary function is to improve conditions on the A303 trunk road. The replacement of a section of local single carriageway trunk road route between Amesbury and Berwick Down will free that section of the road from the regular traffic delays and the material queue lengths which arise as a consequence. The alterations proposed in conjunction with the provision of a dual carriageway route, and the associated proposals in relation to local junctions will have impacts on the local road network administered by Wiltshire Council. These include the reduction in the level of traffic forecast to use the local routes which provide an alternative to the A303 in the vicinity of the Scheme, and also in relation to the amount of traffic attracted to or diverted away from many local roads as a result of the Scheme and its associated junctions.
- 2.3 The traffic modelling work undertaken by HE at the local level indicates that no local routes will be prejudiced by additional traffic.

- 2.4 Wiltshire Council's Local Impact Report (LIR) concluded that the Scheme would result in quicker journey times being achieved on the A303. Furthermore, the proposed grade separated junction at Countess, will have a positive impact at the junction insofar as the current delays will be minimised, the need to use the underpass to cross the junction (east side) will be removed, and this will improve provision for pedestrians.
- 2.5 The LIR also raised concerns regarding junction improvement that would be required at the London Road / High Street junction in Amesbury town centre and potential traffic restrictions on the Allington Track to deter lorries and protect nearby residential properties. The Council has secured this provision through its Side Agreement with HE.
- 2.6 In summary, the Council considers that the Scheme will improve conditions on the A303 trunk road, which will in turn have positive benefits for the surrounding communities through reduced rat-running and improved connections with the local road network.

Economic Growth:

- 2.7 Wiltshire Council's LIR concluded that based on the extensive surveys conducted in the region and analysis of economic data, this assessment of economic impacts has demonstrated that there will be significant benefits associated with dualling the full length of the A303 / A358 / A30. Based on the latest DfT guidance, the analysis has shown that the Scheme will bring a wide range of economic benefits to the South West region and importantly, will help boost employment during a time of continued economic uncertainty.
- 2.8 The established Plan for job growth, as set out in the Wiltshire Core Strategy (WCS), via facilitating growth of existing employers and delivering an attractive investment environment for new inward investment is key to the work of Wiltshire Council. This Plan puts in place policies which will help both attract new inward investment and help existing businesses meet their aspirations in Wiltshire, as well as providing the right environment for business start-ups. The Scheme will remove a potential barrier to investment, improve connectivity between businesses and their customers, and provide employees with greater access to higher value jobs.
- 2.9 The Council considers that the Scheme will enable synergistic labour forces and supply chains when constructing the new development at Boscombe Down Airbase and Porton Down Science Campus, especially the new road from the A303 to the airbase. It will also improve access to the UK's principal military grouping through the Army Rebasing Programme. This in turn will facilitate serious consideration of a boost in housing delivery to match new jobs.
- 2.10 Furthermore, the Scheme will have a twofold impact on tourism in Wiltshire. First, it will improve the setting of Stonehenge and the eastern part of the WHS and access to the wider prehistoric landscape (see section below); second it will improve the accessibility of Wiltshire as a whole to tourists. This boost to tourism will then have positive impacts on the economy of the county, and therefore is in accordance with the economy-led policies set out in the WCS.
- 2.11 In summary, the Council recognises the wider economic benefits the construction of the project will bring to the region. The Scheme is important to support the ongoing economic growth and prosperity of Wiltshire, and necessary to facilitate planned major new developments such as Boscombe Down, Porton Down and Army Basing.

Cultural Heritage:

- 2.12 Wiltshire Council's LIR concluded that the most significant positive impacts associated with the Scheme will be removing the impact of the A303 from the immediate setting of Stonehenge and the eastern part of the WHS. It will also remove the existing severance caused by the existing A303 at the centre of the WHS between the proposed portal locations which will improve the setting of key groups of monuments, which contribute to its Outstanding Universal Value (OUV) and improve access and visual connectivity between them. Furthermore, the departure from design standards to not provide permanent surface lighting within the WHS or at the proposed Longbarrow junction will minimise light pollution. The Council also considers that the proposed new route between Allington Track and Equinox Drive, which includes a divergence of byway AMES 1 to avoid the group of Scheduled Barrows (Ratfin Barrows) will remove traffic from the immediate vicinity of these Barrows.
- 2.13 The Council welcomes the further development of the DAMS during the course of the Examination, including that it will be secured through Requirement 5 (Schedule 2) of the DCO and be a certified document under the DCO. The DAMS sets out a robust framework for the archaeological mitigation works and through the Council's approval of Site Specific Written Schemes of Investigation (SSWSIs), Heritage Management Plans (HMPs) and Method Statements (MS), the Council is confident that this work can be undertaken to its satisfaction. Furthermore, the inclusion of the Public Archaeology and Community Engagement Strategy within the DAMS is a significant public benefit in the Council's view as this will aim to collaboratively interpret and communicate the results of the archaeological evaluation and mitigation programmes to a wide audience, reflecting the high level of public interest generated by the Stonehenge WHS.
- 2.14 The Council welcomes the Design Vision, Design Principles and Design Commitments as contained within Section 4 of the OEMP. As a result, the Council has greater assurance that the detail design will conform with the overall vision, aims and objectives of the Stonehenge and Avebury WHS Management Plan (2015) and sustain the OUV of the WHS.
- 2.15 Wiltshire Council's LIR also concluded that the most significant negative impact would be the new dual carriageway and cutting on the western part of the WHS. Following the review of additional photo montages and visualisations produced during the Examination, the Council accepted that there would be less of an impact from the Winterbourne Stoke Barrow Group than previously thought, however concerns remain about the visual impact on the northern part of the Normanton Barrow Group, the Diamond Group and other monuments and their settings within the visibility of the western end of the Scheme. The Council considers it a missed opportunity to significantly reduce this impact through additional cover. However, the Council considers it can be mitigated to some extent by the use of green infrastructure or other design solutions.
- 2.16 The Council would have preferred for the junction and dumbbell roundabout to be modified to avoid impacting upon the Oatlands Hill buried archaeological remains, especially the C-shaped enclosure. However, HE could not achieve this due to site constraints. The Council considers this a missed opportunity to preserve in situ the archaeological remains in this area.
- 2.17 In summary, the Council considers that the most significant positive impact arising from the Scheme would benefit Cultural Heritage through the removal of the A303 from the immediate vicinity of Stonehenge and the eastern part of the WHS. The negative impacts are confined to the western end of the Scheme which require mitigation at detailed design stage.

Environment and Community:

- 2.18 With respect to the environment, Wiltshire Council's LIR concluded that there were likely to be permanent beneficial landscape and visual effects in operation due to improved tranquillity, habitat creation and a reduction in landscape severance within the WHS. The creation of additional chalk grassland at Parsonage Down will also support increased populations of a wide range of chalk flora, invertebrates and small mammals. It is considered that there is potential for a net gain for biodiversity.
- 2.19 Whilst the LIR identified some negative impacts during construction, the protections secured within the OEMP relating to the Nile Clumps, temporary compounds, fencing, hoardings, lighting and the production of a preliminary works and main works CEMP, with the commitment to ensure that the effects of multiple CEMPs do not combine to produce adverse effects on biodiversity, mitigate these to a large extent.
- 2.20 In terms of community benefits, Wiltshire Council's LIR concluded that the most significant benefit would be the permanent reduction in community severance in Winterbourne Stoke, which would improve social cohesion. The creation of a wider restricted byway network will offer greater opportunities for access to the WHS and wider area for all non-motorised users. The Scheme would also reunite the WHS landscape and reduce severance thereby improving connectivity for walkers, runners, cyclists and horse riders.
- 2.21 The LIR also concluded that the Scheme would provide a permanent improvement in access to local employment and training opportunities through improved journey time reliability, which would lead to improved health and wellbeing. The improved access to and within the WHS would also enhance learning and interpretation.
- 2.22 It is recognised that there is the potential for noise and vibration and air quality effects arising from construction activities to impact on the health of residents and local workers. However, the Council considers that the protections contained within the dDCO and OEMP will ensure appropriate provisions are put in place to minimise any adverse effects as far as possible.
- 2.23 In summary, the Council considers that the Scheme will provide a net gain for biodiversity and generate significant community benefits through improved connectivity and reduced severance.

3. Wiltshire Council's Local Impact Report (LIR)

- 3.1 Wiltshire Council considers that the positive and negative impacts of the proposed Scheme, as identified within its LIR, which was submitted at Deadline 1, remain as stated. However, through the development of the dDCO, OEMP and DAMS, the Council is of the opinion that these have been mitigated as far as possible within the limitations of the DCO process.
- 3.2 Furthermore, the Council can confirm that it is no longer seeking any of the additional Requirements as set out at Appendix B of the LIR as these have been captured to the Council's satisfaction within the final dDCO, OEMP, and DAMS as submitted by HE prior to the close of the Examination and within the Council's agreed Side Agreement with HE.
- 3.3 The Council can also confirm that whilst development consent obligations have not been progressed in relation to this Scheme, the matters as outlined in Appendix C of the LIR have been sufficiently secured within the Council's Side Agreement with HE.

4. Wiltshire Council's Final Position on the dDCO, OEMP and DAMS

- 4.1 Provided that the changes as set-out in the Council's Response to Deadline 9 Submissions document and agreed with HE are made to the dDCO, OEMP and DAMS in HE's final submission prior to the close of the Examination, the Council can confirm that, with the exception of the following, Wiltshire Council is content with the dDCO, OEMP and DAMS as drafted.
- a) The changes proposed by the ExA to the dDCO, which the Council is supporting
 - b) The three changes required to the dDCO, which have been identified by the Council, and arose from the incorporation of amendments to reflect the inclusion of the non-material changes into Examination
 - c) The non-inclusion of the pollution control valve wording in the OEMP
 - d) The additional bullet points required in section 8.3.2 of the DAMS.

5. Conclusion

- 5.1 Wiltshire Council considers that the proposed Scheme achieves the objectives as set by DfT. The Council believes that the Scheme will generate benefits in relation to transport, economic growth, cultural heritage and environment and community.
- 5.2 Where the Scheme has been assessed to provide negative impacts, the Council considers that these have been appropriately mitigated through provisions contained within the dDCO, OEMP, DAMS and the Council's Side Agreement with HE.
- 5.3 The Council is supportive of the Scheme, and associated Corridor improvements, and wishes to see the Scheme progress through to completion so that the identified benefits can be realised for the residents of Wiltshire as well as the wider public.