

A303 Amesbury to Berwick Down

TR010025

Additional Submission 8.65 Updates to the National Policy Statement for National Networks Compliance Tracker

APFP Regulation 5(2)(q)

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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Infrastructure Planning

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A303 Amesbury to Berwick Down

Development Consent Order 20[**]

Updates to the National Policy Statement for National Networks Compliance Tracker

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1 Updates to the NPS Accordance Table

1.1 Context

- 1.1.1 Appendix A-1 of the Case for the Scheme and NPS Accordance [APP-294] included a tracker which sets out a full assessment of how the Scheme conforms with the National Policy Statement for National Networks (NPSNN) (including its assessment requirements).
- 1.1.2 This document provides an update to the NPS Accordance Table. It records further compliance with the NPS demonstrated by submissions during the examination.
- 1.1.3 This document does not reproduce the entire NPS Accordance Table. Rather, it includes only those extracts for which there are updates.
- 1.1.4 This document should be taken into account when considering Section 8 of the Case for the Scheme document [APP-294].

1.2 Updates to the NPS Compliance Tracker

- 1.2.1 Where there is an update to the NPS Accordance Table, that entry has been extracted from the table and included in the relevant table below. An additional column has been added to the tracker and the only changes to the tracker previously submitted are contained within this additional column.
- 1.2.2 Entries in the additional column record further compliance with the NPS demonstrated since the application was submitted.
- 1.2.3 The Applicant's Closing Submission, submitted alongside this updated NPS Accordance Table, also addresses compliance with key requirements of the NPSNN.

Table 1 NPS Chapter 2

NPSNN Paragraph Number	Requirement of the NPSNN	Compliance with the NPSNN	Update as at Close of Examination
2	THE NEED FOR DEVELOPMENT OF THE NATIONAL NETWORKS AND GOVERNMENT'S POLICY		
2.1	<p>The national road and rail networks that connect our cities, regions and international gateways play a significant part in supporting economic growth, as well as existing economic activity and productivity and in facilitating passenger, business and leisure journeys across the country. Well-connected and high-performing networks with sufficient capacity are vital to meet the country's long- term needs and support a prosperous economy.</p>	<p>The A303 Stonehenge Scheme forms part of a package of proposals for the A303/A30/A358 corridor to achieve a modern standard dual carriageway, improving the vital connection between the South West and London and the South East, and including the upgrade of remaining single carriageway sections on the route to dual carriageway. The Transport Assessment (Application Document 7.4) shows the Scheme would enable significant increases in traffic volumes using the A303 through increased capacity and a reduction in delays. These improvements would make the local area, and the South West, more attractive for businesses to locate and would help in promoting a competitive local economy. Through these improvements, the Scheme would also benefit leisure and business travellers, for example those using the A303 to journey to the South West. The Scheme would upgrade the existing A303 to a modern higher performing standard, and this would improve safety and reduce accidents on the route.</p> <p>The economic benefits of the Scheme are as per NPSNN paragraph 2.2 of this Appendix.</p>	<p>Wiltshire Council, in their Local Impact Report [REP1-057] Section 4, outline the positive contribution the scheme will provide to Local Growth and Development and, in Section 14, state “The council recognises the wider economic benefits the construction 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.”</p> <p>Heart of South West Local Enterprise Partnership, which covers Devon, Somerset, Plymouth and Torbay [REP2-099] state how they strongly support the need for the scheme, not just for the economic benefits which would result from upgrading the corridor, but also for the improved resilience that it would offer.</p> <p>Devon County Council has reiterated the importance of the scheme for supporting economic growth in the South West region, both at the Issue Specific Hearing (Issue Specific Hearing 6 [REP4-034] and in written submissions [REP1-060, REP2-085 and REP4-061].</p>

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2	THE NEED FOR DEVELOPMENT OF THE NATIONAL NETWORKS AND GOVERNMENT'S POLICY		
2.2	<p>There is a critical need to improve the national networks to address road congestion and crowding on the railways to provide safe, expeditious and resilient networks that better support social and economic activity; and to provide a transport network that is capable of stimulating and supporting economic growth. Improvements may also be required to address the impact of the national networks on quality of life and environmental factors.</p>	<p>The Scheme would create appropriate capacity to cope with peak demand and growth on the SRN, and provide a free flowing, safe, reliable and resilient network for the future.</p> <p>The Transport Assessment (Application Document 7.4) describes the operational impacts of the Scheme on traffic. The model assesses neutral month morning, interpeak and evening peak periods. The neutral month model represents the average Monday-Friday weekday in October 2017. Given the specific issues on the A303 caused by holiday traffic, a busy period model has also been developed. The 'busy day' model represents an average Friday-Sunday from 15 July to 28 August 2017, but is also considered representative of other times of year.</p> <p>Journey times along the length of A303 between its junctions with the A34 north of Winchester and A36 north west of Salisbury incorporating the Scheme are in the region of half an hour in both directions in all neutral month time periods in 2017, with journey times slightly higher in the eastbound direction in the AM peak, and westbound direction in the PM peak. In the busy day model, average journey times are around 10 minutes longer than the neutral peaks, and are forecast to increase by a further 10 minutes by 2041.</p>	<p>See Update to 2.1 which is relevant to this section of the NPSNN.</p>

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		<p>The addition of the Scheme will result in journey time savings of circa four minutes throughout most days, and an average of about 20 minutes across busy days. This demonstrates that the Scheme will deliver significant journey time benefits. The benefits will be most pronounced on busy days, where substantial journey time savings will result in journey times being comparable with the neutral month time periods, where there will be minimal congestion and delay.</p> <p>The new dual carriageway and junctions on the Scheme will be designed to modern safety standards and will provide for safer and quicker journeys for all road users.</p> <p>The improved route will also be more resilient and less susceptible to disruption due to the additional lanes, recovering faster from incidents.</p> <p>Environmental factors are further addressed in the Environmental Statement (Application Document 6.1); a summary of the benefits is provided in NPSNN paragraph 2.6 and 3.2 of this Appendix, and quality of life factors are considered in NPSNN paragraph 2.16 of this Appendix.</p>	
2.6	There is also a need for development	The government is concerned that the UK	See Update to 2.1 which is relevant to this section of the NPSNN.

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	<p>on the national networks to support national and local economic growth and regeneration, particularly in the most disadvantaged areas. Improved and new transport links can facilitate economic growth by bringing businesses closer to their workers, their markets and each other. This can help rebalance the economy.</p>	<p>economy is not functioning efficiently due to 'market distortions' or 'failures'⁴⁶. The economy of the South West performs poorly compared to other regions of the UK, with a lower than average GDP per capita⁴⁷. This is largely due to its location but is made worse by the congestion, delays and unreliable journey times caused by inefficient transport infrastructure.</p> <p>Chapter 2 of this Case for the Scheme document describes the issues created by the current A303 for the economy. These include:</p> <ul style="list-style-type: none"> • there is a significant 'productivity gap' between the south east and the south west, exacerbated by poor connectivity; • congestion is a barrier to economic growth in the south west. 92,000 jobs are projected to be created in the south west by 2021, alongside growth in housing. The existing road cannot support this growth; • congestion and poor journey time reliability 	

⁴⁶ TAG Unit A2.1 Wider Economic Impacts Appraisal, DfT, May 2018

⁴⁷ EU Regional Innovation Monitor, base profile, South West England

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		<p>are a constraint to local businesses;</p> <ul style="list-style-type: none"> tourism and the visitor economy, locally and nationally, are constrained by congestion and unreliable journey times. <p>The conventional economic costs and benefits of the Scheme (savings in journey times, operating costs, greenhouse gases and collisions) are quantified and monetised in the ComMA Appendix D: Economic Appraisal Package, (Application Document 7.5), together with an assessment of wider economic impacts including: agglomeration benefits (due to businesses being in close proximity), labour supply impacts (more people may enter the labour market if their travel costs are reduced) and a move to more productive jobs (by improving access to areas of higher productivity). A Wider Economic Impact Assessment⁴⁸ has concluded that the Scheme would create 1,800 new jobs by 2040, excluding construction effects.</p> <p>Chapter 5 of this Case for the Scheme document describes the economic benefits of</p>	

⁴⁸ A303 Amesbury to Berwick Down Wider Economic Impact Assessment. (PwC, July 2016).

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		<p>the Scheme, which result from reduced congestion, improved journey reliability and improved journey times, including supporting growth in:</p> <ul style="list-style-type: none"> • business growth locally and in the South West; • housing growth, stimulating the local economy; and • growth in tourism. <p>The Scheme provides around £252 million of user benefits, taking into account the impacts of the Scheme on travel times, and the disbenefits experienced during an anticipated five-year period of construction.</p> <p>Further to the core transport user benefits, the impact of the Scheme on journey time reliability and wider economic impacts has been appraised. Journey time reliability has been calculated through analysis of observed journey time data for the single-carriageway section of the A303 past Stonehenge and a comparative dual- carriageway section. Analysis in-line with WebTAG results in a journey time benefit of around £61 million.</p> <p>Wider economic impacts considered include growth in the economy through agglomeration, improved labour supply and increased output in</p>	

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		imperfectly competitive markets. The benefit to the wider economy is considered to be around £35 million.	
2.7	In some cases there may be a need for development to improve resilience on the networks to adapt to climate change and extreme weather events rather than just tackling a congestion problem.	Chapter 11 Road Drainage and the Water Environment of the Environmental Statement (Application Document 6.1) and Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application Document 6.3), consider the impact of flooding from climate change, and describes how this is taken into account within the Scheme. The road is designed (as set out in Appendix 11.3 Road Drainage Strategy of the Environmental Statement Appendices (Application Document 6.3)) to minimise the risk of it flooding from the Scheme, and also the risk of flooding to the Scheme, by incorporating current design standards and future climate change allowances to improve its resilience.	<p>The Flood Risk Assessment (FRA) was updated following comments from the Environment Agency and was re-submitted at Deadline 3 [REP3-008].</p> <p>The Statement of Common Ground [REP7-005] with the Environment Agency confirms that the climate change allowance methodology in the FRA is agreed (Ref 3.26) and that no outstanding matters are still to be agreed or are in discussion in relation to resilience of the Scheme to climate change.</p> <p>Chapter 14 Climate of the ES [APP-052] assesses the impact of climate change impacts and where necessary identifies appropriate measures to improve the resilience of the Scheme. The resilience assessment for the ES was undertaken using United Kingdom Climate Projections (UKCP09), the latest set of projection data available at the time the assessment was undertaken.</p> <p>Subsequently, updated climate projections (UKCP18) have been published and an updated assessment of the resilience of the Scheme undertaken. The response to SWQ</p>

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			CC 2.4 [REP6-025] presents the results of this assessment as well as a comparison between the climate change impacts identified using UKCP09 and UKCP18. It was concluded that the mitigation measures built into the design and assumed management practices identified in ES Chapter 14 Section 14.8 [APP-052] and ES Appendix 14.2 (Summary of climate impact effects) [APP- 289] are still appropriate and no additional impacts are expected as a result of the change in projections. The new projections do not affect the conclusions of Chapter 14.
2.10	The Government has therefore concluded that at a strategic level there is a compelling need for development of the national networks - both as individual networks and as an integrated system. The Examining Authority and the Secretary of State should therefore start their assessment of applications for infrastructure covered by this NPS on that basis.	<p>The A303 forms one of two strategic routes between the South East and South West regions of the UK, the other being the M4/M5 corridor. Together with the A30 and A358, the A303 plays a vital role in supporting the economy of the South West peninsula and the wider South West region.</p> <p>The Government's aim, announced in the Road Investment Strategy for the 2015/16 to 2019 Road Period ("RIS1") is to upgrade all remaining single carriageway sections of the A303 between the M3 and the A358 to create a high quality dual carriageway route to the South West on which mile-a-minute journeys are the norm.</p> <p>Full details on the need for the Scheme are provided in Chapter 3 of this Case for the</p>	See Update to 2.1 which is relevant to this section of the NPSNN.

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		Scheme (Application Document 7.1).	
2.16	<p>Traffic congestion constrains the economy and impacts negatively on quality of life by:</p> <ul style="list-style-type: none"> - Constraining existing economic activity as well as economic growth, by increasing costs to businesses, damaging their competitiveness and making it harder for them to access export markets. Businesses regularly consider access to good roads and other transport connections as key criteria in making decisions about where to locate. - Leading to a marked deterioration in the experience of road users. For some, particularly those with time pressured journeys, congestion can cause frustration and stress, as well as inconvenience, reducing quality of 	<p>The Government is concerned that the UK economy is not functioning efficiently due to 'market distortions' or 'failures'⁴⁹. The economy of the South West performs poorly compared to other regions of the UK, with a lower than average GDP per capita⁵⁰. This is largely due to its location but is made worse by the congestion, delays and unreliable journey times caused by inefficient transport infrastructure.</p> <p>Businesses in the South West have identified disruption to business travel and unreliable journey times due to congestion as major barriers to the growth of the region. In a survey⁵¹ of over 650 businesses, 89% felt that the current unreliability of the A303 was harming their business.</p> <p>Local communities along the length of the existing A303 and to the north and south of the road are directly affected and blighted by the intrusion and congestion on the A303, and by</p>	See Update to 2.1 which is relevant to this section of the NPSNN.

⁴⁹ TAG Unit A2.1 Wider Economic Impacts Appraisal, DfT, May 2018

⁵⁰ EU Regional Innovation Monitor, base profile, South West England

⁵¹ A303/A30/A358 Corridor Improvement Programme – Economic Impact Study. Parsons Brinkerhoff, February 2013.

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	<p>life.</p> <ul style="list-style-type: none"> - Constraining job opportunities as workers have more difficulty accessing labour markets. - causing more environmental problems, with more emissions per vehicle and greater problems of blight and intrusion for people nearby. <p>This is especially true where traffic is routed through small communities or sensitive environmental areas</p>	<p>traffic seeking to avoid congestion and delays. The traffic on the road also results in significant environmental impacts including high levels of traffic noise, visual intrusion and impact on wildlife.</p> <p>The Environmental Statement (Application Document 6.1) identifies sensitive environmental areas which are considered within the assessment. The existing A303 passes through a small community (Winterbourne Stoke) and within or close to sensitive environmental areas, which include Parsonage Down National Nature Reserve (NNR), the River Till Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC), Stonehenge, Avebury and Associated Sites WHS, the River Avon SSSI and SAC.</p> <p>Chapter 5 of this Case for the Scheme document indicates that the Scheme provides a significant improvement to the SRN between Amesbury and Berwick Down by dualling the A303 and improving connections with local roads. The Scheme would therefore support the delivery of more resilient communities in the area local to the Scheme. It would create appropriate capacity to cope with peak demand and growth on the SRN and provide a free flowing, safe and reliable network for the future which would support local growth. The Scheme</p>	

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		<p>would also improve access to the local area and the South West region and thus indirectly support economic productivity. This in turn would support and attract businesses to the South West and local area as well as boosting tourism and creating jobs.</p> <p>As described in Chapter 13 of the Environmental Statement (Application Document 6.1), the reduction in congestion and associated vehicular user severance on the route would reduce driver stress and would therefore improve driver experience.</p> <p>The Scheme would reunite the WHS, it would restore the tranquility of the WHS landscape; reconnect the WHS with local communities; and improve provision for NMUs. It is expected to result in more visitors being attracted to the WHS and the local area. Furthermore, it would deliver biodiversity benefits with the introduction of measures such as green bridges and a net increase in semi natural habitat.</p> <p>Chapter 13 of the Environmental Statement (Application Document 6.1) considers effects on the amenity of residents. The assessment concludes that there are no residents or users of public rights of way, community facilities or businesses that would experience a significant effect on their amenity either during construction</p>	

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		or operation.	
2.17	The national road network is already under significant pressure. It is estimated that around 16% of all travel time in 2010 was spent delayed in traffic, and that congestion has significant economic costs: in 2010 the direct costs of congestion on the Strategic Road Network in England were estimated at £1.9 billion per annum.	<p>The extent to which existing and future congestion on the route is a constraint to the local and South West economy is described in Chapter 3 of the Case for the Scheme (Application Document 7.1). In a survey⁵² of over 650 businesses in the South West, 89% of respondents felt that the current unreliability of the A303 was harming their business. In the local area, a survey by Salisbury and District Chamber of Commerce, 50% of local firms said congestion on the A303 had a negative impact on their business.</p> <p>The journey time savings delivered by the Scheme are as per NPSNN Paragraph 2.2 of this appendix.</p>	See Update to 2.1 which is relevant to this section of the NPSNN.
2.18	The pressure on the road network is forecast to increase with economic growth, substantial increases in population and a fall in the cost of car travel from fuel efficiency improvements.	The Transport Assessment (Application Document 7.4) sets out the methodology used in assessing future traffic pressures and this has informed the design of the Scheme. The effects the Scheme would have on traffic delays, taking account of increasing future demand, are as per	See Update to 2.1 which is relevant to this section of the NPSNN.

⁵² A303/A30/A358 Corridor Improvement Programme – Economic Impact Study. Parsons Brinkerhoff, February 2013.

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	<p>Under the Department's 2014 estimates, it is forecast that a quarter of travel time will be spent delayed in traffic by 2040, with direct costs rising to £9.8 billion per annum by 2040 on the Strategic Road Network in England, without any intervention. Under our low and high demand scenarios, the proportion of travel time spent delayed in traffic could range between 12.1% and 21.8% on the Strategic Road Network.</p> <p>When considering all the roads within England, our central estimates would amount to:</p> <ul style="list-style-type: none"> a. A 71% increase in the number of hours households spend delayed in traffic each year, from 45 hours in 2010 to 76 hours in 2040 b. A 150% increase in the number of working days lost to congestion each year (from 42 million in 2010 to 106 million in 2040). 	NPSNN Paragraph 2.2 of this Appendix.	
2.22	Without improving the road network, including its performance, it will be difficult to support further economic	Chapter 5 of this Case for the Scheme document demonstrates that the Scheme provides a significant improvement to the SRN	See Update to 2.1 which is relevant to this section of the NPSNN.

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	development, employment and housing and this will impede economic growth and reduce people's quality of life. The Government has therefore concluded that at strategic level there is a compelling need for development of the national road network.	between Amesbury and Berwick Down by dualling the A303 and delivering other improvements such as improved connections with local roads. The Scheme would therefore support the delivery of more resilient communities in the area local to the Scheme. It would create appropriate capacity to cope with peak demand and growth on the SRN and provide a free flowing, safe, reliable and resilient network for the future which would support economic and housing growth. The Scheme would also improve access to the local area and the South West region and thus indirectly support economic productivity. This in turn would support and attract businesses to the region and local area as well as boost tourism and create jobs.	
2.27	In some cases, to meet the need set out in section 2.1 to 2.11, it will not be sufficient to simply expand capacity on the existing network. In those circumstances new road alignments and corresponding links, including alignments which cross a river or estuary, may be needed to support increased capacity and connectivity.	Chapter 3 Assessment of Alternatives of the Environmental Statement (Application Document 6.1) sets out the process of options identification, selection and development. It explains why the alignment of the Scheme, including the crossing of the Rivers Till and Avon, remains close to the alignment of the existing A303 and why an alternative alignment taking the road outside the WHS would not be deliverable.	The Technical Appraisal Report [REP1-031 to 038] and Scheme Assessment Report [REP1-023 to 030] were submitted at Deadline 1 and provide further detailed information on the options process undertaken to identify and assess alternatives, including alternative solutions. Both reports were considered as part of the Environmental Statement (Application Document 6.1).

Table 2 NPS Chapter 3

NPS Paragraph Number	Requirement of the National Policy Statement for National Networks (NPS)	Compliance with the NPS	Update as at Close of Examination
3	WIDER GOVERNMENT POLICY ON THE NATIONAL NETWORKS		
3.2	<p>The Government recognises that for development of the national road and rail networks to be sustainable these should be designed to minimise social and environmental impacts and improve quality of life.</p>	<p>The objectives of the Scheme are: Transport: to create a high quality reliable route between the South East and 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 WHS and to make it easier to reach and explore; and Environment and Community: to improve biodiversity and provide a positive legacy for nearby communities.</p> <p>Whilst the Scheme does have impacts (as expressed in the Environmental Statement), the Scheme has been designed to meet the above objectives and will minimise social and environmental impacts and improve quality of life, as per NPSNN Paragraph 2.16 of this Appendix. In addition, the Scheme would result in an overall reduction in disturbance from traffic noise within Winterbourne Stoke and other nearby communities affected by rat running and congestion; as well as improving connectivity</p>	<p>Following ongoing consultation, the OEMP, to be certified with the DCO and secured by Requirement 4, has been updated during the Examination and the final draft has been submitted at Deadline 9 [REP9-013], including with it a comparison to the original version of the OEMP [REP9-030] so it can be seen how Highways England has responded to the concerns of stakeholders.</p> <p>The OEMP has been updated to include further detail of the control and mitigation measures that will be implemented. Specific examples of changes to the OEMP, including additional commitments are included within the NPSNN paragraph responses below.</p> <p>The OEMP also sets out a number of design commitments in respect of the Scheme, and, in section 4, a commitment to the design vision and a series of design principles for the Scheme which will inform the detailed design along with a comprehensive engagement process to be followed with stakeholders on the suite of design and environmental management documents that will be developed as the scheme progresses.</p>

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		<p>between communities across the route corridor. These improvements would improve quality of life within those communities. These benefits are described in further detail in Chapter 5 of this Case for the Scheme document.</p> <p>The Scheme would deliver a wide range of environmental and social benefits and these are discussed in Chapter 5 of this Case for the Scheme document.</p>	
3.3	<p>In delivering new schemes, the Government expects applicants to avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF and the Government’s planning guidance. Applicants should also provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of schemes.</p>	<p>At the core of the NPPF is a presumption in favour of sustainable development. The principles of the NPPF relevant to each of the topics covered in the ES, and local planning policies that need to be considered, are set out in Chapter 7 of this Case for the Scheme document. An Environmental Impact Assessment (EIA) of the Scheme has been carried out, and is reported in the Environmental Statement (Application Document 6.1) which assesses the likely significant environmental impacts of the Scheme (including those on local communities) and presents mitigation for the likely significant adverse environmental effects arising from the Scheme. The residual significant environmental effects of the Scheme (following mitigation which</p>	<p>Please see the Closing Submission, which considers the Examination submissions to reinforce the conclusions made in the Case for the Scheme, that the Scheme benefits are many, and heavily outweigh its few adverse impacts.</p>

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		<p>is proposed) are described in Environmental Statement Chapter 16 (Application Document 6.1).</p> <p>The environmental and social benefits of the Scheme are summarised in Table 5-1 of this document.</p>	
3.6	<p>Transport will play an important part in meeting the Government's legally binding carbon targets and other environmental targets. As part of this there is a need to shift to greener technologies and fuels, and to promote lower carbon transport choices. Over the next decade, the biggest reduction in emissions from domestic transport is likely to come from efficiency improvements in conventional vehicles, specifically cars and vans, driven primarily by EU targets for new vehicle CO2 performance. Electrification of the railway will also support reductions in carbon.</p>	<p>Chapter 14 Climate of the Environmental Statement (Application Document 6.1) provides an assessment of greenhouse gas (GHG) emissions arising from the construction and operation of the Scheme. The ES acknowledges that GHG emissions per vehicle are expected to decrease over time due to increased vehicle efficiency and the use of alternative fuels.</p>	<p>The assessment of carbon emissions presented in Chapter 14 of the ES [APP-052] considers the carbon emissions impact of road users. Carbon emissions from road users have been calculated as part of the WebTag ("Web Transport Assessment Guidance") assessment process. Between 2026, the year of opening and 2032, the end year of the latest carbon budget to be set, carbon emissions from road users are estimated to increase by 16%. As stated in Chapter 14 of the ES, paragraph 14.3.7, however, the uptake of lower carbon fuels, electric vehicle technology and the decarbonisation of the grid is not accounted for under the HA207/07 approach used for the carbon assessment. The approach in the ES therefore represents a very conservative one.</p> <p>Chapter 14 of the ES [APP-052] also presented the GHG emissions arising from the Scheme in the context of their impact on the UK meeting its legally binding carbon reduction targets. At the time the carbon assessment presented in Chapter 14 was undertaken, the UK's carbon reduction target was an 80% reduction of carbon emissions by 2050 compared to 1990 levels. To</p>

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			<p>meet this 2050 target, a series of legally binding five-year carbon budgets, currently set though to 2032 have been set. Chapter 14 considered the GHG impacts of the Scheme against the carbon budget period in which the emissions arose. The assessment presented in Chapter 14 concluded that the carbon impact of the Scheme would be within the carbon budget threshold and therefore not have a material impact. The updated assessment set out in the Applicant's response to the Examining Authority's First Written Question CC.1.6 [REP2-028] demonstrates the Scheme's Greenhouse Gas (GHG) impact as a proportion of total UK carbon emissions noted that it equates to 0.023% of the fourth carbon budget and 0.008% of the fifth carbon budget.</p> <p>More recently, the Climate Change Act 2008 (2050 Target Amendment) Order 2019[2] (the 2019 Order) has come into force, which amends the Climate Change Act 2008 by revising the previous 2050 carbon target (an 80% reduction of GHG compared to 1990 levels) to a net zero carbon target by 2050. REP6-025 addresses the impacts of the Scheme considering the revised 2050 carbon target. Further consideration of the impact of the Scheme against this revised target is presented in 3.8.</p> <p>Since the publication of the ES, the UK Government has issued the strategy document 'Road to Zero' 1(2018), which sets out measures to help achieve carbon reduction in the transport sector e.g. by 2030 between 50% and 70% of new car sales and 40% of new van sales will be ultra-low emission vehicles, and by 2040 all new car and van sales</p>

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			<p>will be zero carbon vehicles, therefore road user emissions will decrease. As the impact of increased electric vehicles and the decarbonisation of grid electricity takes effect the carbon impact associated with road users will decrease and will be significantly lower than the figures in the assessment that is presented in Chapter 14 of the ES. As the national grid is decarbonised and the uptake of electric vehicles increases in line with Government Policy, so the use of electric vehicles in place of combustion engine driven vehicles will contribute to meeting UK carbon reduction targets. Please also see the Applicant's response to paragraph 3.8.</p> <p>1Road to Zero, Department for Transport, July 2018 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf</p> <p>2The Climate Change Act 2008 (2050 Target Amendment) Order 2019 http://www.legislation.gov.uk/ukdsi/2019/9780111187654</p>
3.8	The impact of road development on aggregate levels of emissions is likely to be very small. Impacts of road development need to be seen against significant projected reductions in carbon emissions and improvements in	Chapter 14 Climate of the Environmental Statement (Application Document 6.1) indicates that GHG emissions arising as a result of the Scheme represent less than 0.03% of total emissions in any five-year carbon budget during which they arise. The Environmental Statement concludes that the GHG emissions arising as a	The carbon assessment in Chapter 14 of the Environmental Statement (ES) [APP-052] presents the impact of the Scheme against the UK meeting its legally binding carbon reduction targets. At the time the carbon assessment presented in Chapter 14 was undertaken, the UK's carbon reduction target was an 80% reduction of carbon emissions by 2050 compared to 1990 levels. To meet this 2050 target, a series of legally binding five-year

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	<p>air quality as a result of current and future policies to meet the Government's legally binding carbon budgets and the European Union's air quality limit values. For example:</p> <p>Carbon – the annual CO₂ impacts from delivering a programme of investment on the Strategic Road Network of the scale envisaged in Investing in Britain's Future amount to well below 0.1% of average annual carbon emissions allowed in the fourth carbon budget This would be outweighed by additional support for ULEVs also identified as overall policy.</p> <p>Air quality – aggregate air quality impacts from delivering a programme of investment on the Strategic Road Network of the scale envisaged in Investing in Britain's Future are small. Total</p>	<p>result of the Scheme would not have a material impact on the Government meeting its carbon reduction targets. In addition, the assessment concludes that no significant cumulative effects with other schemes are anticipated.</p> <p>Chapter 5 Air Quality of the Environmental Statement (Application Document 6.1) assesses the impact of the Scheme during construction and operation on air quality. There are no predicted annual average concentrations of NO₂ above the air quality objective in either the years of construction or first year of operation for the scheme in the air quality study area. Therefore, there are no small, medium or large changes in air quality above the air quality objective set by the EU and transposed into UK law by the Air Quality Standards Regulations 2010.</p> <p>A compliance risk assessment has been undertaken for the air quality study area. This found that there are no links reported by Defra to the European Commission as non-compliant in either the years of construction or the first year of scheme operation within the air quality study area. This indicates there is no compliance risk for the Scheme.</p>	<p>carbon budgets, currently set though to 2032, have been laid down in Parliament and provide a carbon reduction trajectory that the UK must adhere to allow the 2050 carbon reduction target be met. Each carbon budget provides a forecast for a permissible level of carbon emissions within a five-year period. The carbon budgets allow for an increasing reduction in emissions over time to allow for the implementation of necessary policy change and improved technologies to allow for the 2050 target to be met.</p> <p>Carbon emissions from the Scheme have been tested against the five-year carbon budget period in which they arise to determine if the Scheme will have an impact on the UK meeting the 2050 target. The assessment presented in Chapter 14 concluded that the carbon impact of the Scheme would be within the carbon budget threshold and therefore not have a material impact. The updated assessment set out in the Applicant's response to the Examining Authority's First Written Question CC.1.6 [REP2-028] demonstrates the Scheme's Greenhouse Gas (GHG) impact as a proportion of total UK carbon emissions noted that it equates to 0.023% of the fourth carbon budget and 0.008% of the fifth carbon budget.</p> <p>More recently, the Climate Change Act 2008 (2050 Target Amendment) Order 2019[1] (the 2019 Order) has come into force, which amends the Climate Change Act 2008 by revising the previous 2050 carbon target (an 80% reduction of GHG compared to 1990 levels) to a net zero carbon target by 2050. REP6-025 addresses the impacts of the</p>

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	<p>PM10 and NOX might be expected to increase slightly, but this needs to be seen in the context of projected reductions in emissions over time. PM10 and NOX are expected to decrease over the next decade or so as a result of tighter vehicle emission standards, then flatten, with further falls over time due to greater levels of electric and other ultra- low emission vehicles.</p>	<p>The air quality effects of the Scheme for European and National designated ecosystem sites are considered in Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1). The assessment concludes that the predicted changes in air quality and nitrogen deposition are not significant.</p>	<p>Scheme considering the revised 2050 carbon target. In summary, the Committee on Climate Change, which is responsible for setting the carbon budgets, have acknowledged that to meet the new target a steeper reduction trajectory will be required and have stated that they will be reviewing the carbon budgets in 2020 to account for the new 2050 target. The updated budgets have not yet been released and are not expected to be prior to the close of this Examination. It has therefore not been possible to assess the Scheme against the revised carbon budgets.</p> <p>However, in any event the carbon assessment (which has been undertaken using a conservative, ‘worst-case emissions’ approach) has considered emissions from the Scheme in two separate phases, emissions during construction and emissions during operation. Construction of the Scheme is a short-term activity that will be complete by 2026. Emissions from construction therefore fall within the nearer term 3rd and 4th carbon budgets. Emissions from the operation of the Scheme will fall into the 4th, 5th and subsequent future budgets once set through to 2050. Whilst a reduction in the carbon budgets may occur in the 2020 review, the Committee on Climate Change has indicated that the trajectory will be steeper therefore it is later carbon budgets rather than near term ones which will see a greater impact. The Scheme contributions</p> <p>[1] 2019 No 1056. The Climate Change Act 2008 (2050 Target Amendment) Order 2019</p>

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			<p>In the context of the Scheme contribution figures as set out in the Applicant's Response to the ExA's First Written Question CC.1.6 (further noting that this assessment is conducted on a conservative, worst case scenario basis as explained above) these demonstrate that the Scheme's GHG impact as a proportion of total UK carbon emissions is negligible such that it can be considered to be immaterial and are unlikely to impact on the UK achieving its carbon targets.</p>
3.10	<p>The Government's overall vision and approach on road safety is set out in the Strategic Framework for Road Safety. It is a vision in which Britain remains a world leader in road safety; where highway authorities are empowered to take informed decisions within their area; where driver and rider training gives learners the skills they need to be safe on our roads; and where tough measures are taken against the minority of offenders who deliberately</p>	<p>The Scheme has been designed in accordance with a number of design principles and technical design codes which support the overarching vision for road safety. Section 3.4 Other design principles and requirements of the Design and Access Statement (DAS) (Application Document 7.2) details those documents which have influenced design and contain road safety design principles and features which have been embodied into the Scheme. Section 6.2 Scheme wide design principles of the DAS provides further detail on how the scheme addresses some safety design considerations.</p> <p>The Scheme would upgrade the existing A303 to a</p>	<p>The Scheme has been subject to Stage 1 Road Safety Audit (RSA) – as recorded in item 4.62 of the NPS Accordance Table [APP-294]. Without exception, each recommendation made by the auditor has either been addressed or will be addressed during the detailed design, in accordance with Highways England and DfT guidance.</p>

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	<p>choose to drive dangerously. As set out in paragraphs 4.60 to 4.66, Scheme promoters are expected to take opportunities to improve road safety, including introducing the most modern and effective safety measures where proportionate.</p>	<p>modern standard. Junctions are largely or entirely grade separated, so traffic on the main road can proceed without stopping. The Scheme includes technology to manage traffic and provide better information to drivers. This is achieved by designing the route to desirable minimum standards as defined in Design Manual for Roads and Bridges (DMRB) (June 2018). These include vehicle restraint system barriers, which would be provided in accordance with the required standards.</p> <p>An analysis of predicted accidents and casualties for the 60-year appraisal period has been undertaken, and is presented within Chapter 5 of the Transport Assessment (Application Document 7.4). For the Scheme section only (not considering other corridors), the Scheme would result in a decrease in accidents and casualties over the 60-year appraisal period. As stated in Chapter 5 of this Case for the Scheme document, the monetary value of the overall change in forecast accidents is a benefit of £4 million. Further detail on the benefits for accidents and casualties is provided at NPSNN Paragraph 4.61 of this Appendix.</p> <p>The tunnel design addresses European Directive</p>	

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		<p>2004/54/EC of the European Parliament on minimum safety requirements for tunnels in the Trans-European Road Network and as outlined in NPSNN Paragraphs 4.60-66 of this Appendix. This includes, lighting the tunnel internally ensuring safety of road users. Escape routes would be provided between the tunnel portals. The Scheme is being designed in accordance with the Design Manual for Roads and Bridges (2018), which provides modern and rigorous highways safety standard for roads and tunnels.</p>	
Sustainable Transport			
3.17	<p>There is a direct role for the national road network to play in helping pedestrians and cyclists. The Government expects applicants to use reasonable endeavours to address the needs of cyclists and pedestrians in the design of new Schemes. The Government also expects applicants to identify opportunities to invest in infrastructure in locations where the national road network severs communities and acts as a barrier to cycling and walking, by correcting historic problems,</p>	<p>Chapter 13 People and Communities of the Environmental Statement (Application Document 6.1) identifies the existing safety and severance issues for NMUs using the existing PRoW and road network and sets out mitigation and enhancements proposed as part of the Scheme. These include:</p> <ul style="list-style-type: none"> - new PRoWs created in the western section along the de-trunked/downgraded A303, including on the north and south side of the new alignment and a new segregated bridleway east from Winterbourne Stoke to the new Longbarrow Junction; - the provision of ‘green bridges’ one of which 	<p>A change to a public right of way at the Stonehenge Visitor Centre has been proposed by the Applicant and interested parties and was discussed at ISH 9 (see written summary of oral submission [REP8-017]). This change seeks to further improve the amenity of walkers and cyclists following discussions within and outside of ISHs with stakeholders. The Examining Authority confirmed in its 27 September Procedural Decision [PD-021] acceptance of NMC-06 Option B and/or the related ‘substitute solution’ as described in chapter 5 of the Proposed Changes Consultation Report [REP8-015] and in chapter 5 of the Proposed Changes Position Statement submitted by the Applicant at Deadline 9 [REP9-027].</p> <p>The summary of oral submissions at ISH6 [REP4-034] considered the development of key PRoW proposals within</p>

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	<p>retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use junctions.</p>	<p>facilitates the realignment of the existing WSTO6B PRoW and two of which each provide a new NMU route; and</p> <ul style="list-style-type: none"> - the tunnelling of the A303 and downgrading the current road in that section to a route open to NMUs only and extending to the Stonehenge Visitor Centre to the north and AMES13 to the south. <p>Severance is also considered further in response to NPSNN paragraph 3.19.</p> <p>In addition to accessibility improvements, the Chapter 13 People and Communities of the Environmental Statement (Application Document 6.1) identifies the following safety benefits of the Scheme:</p> <ul style="list-style-type: none"> - improved amenity experience and safety of PRoW users through the tunnelling, de-trunking of the A303 and the provision of newly created NMU routes; and - improved safety for residents in the vicinity of the junctions through improved NMU facilities and separating trunk road traffic from local traffic movements, as well as providing a consistent high standard of signing relating to 	<p>the Scheme which had been queried by interested parties and explained why they are necessary, further to this policy. This built on Highways England's response to Ag1.4 [REP2-022] and its responses to the FWQ questions on the Tr Topic [REP2-036] and the responses to written representations [REP3-013]. See also the Closing Submission submitted and the reponses to Mr Roger Upfold and the British Horse Society at Deadline 8 [REP8-013] and 9 [REP9-022].</p>

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		the junctions.	
Accessibility			
3.19	<p>The Government is committed to creating a more accessible and inclusive transport network that provides a range of opportunities and choices for people to connect with jobs, services and friends and family.</p>	<p>As set out in Chapter 13 People and Communities of the Environmental Statement (Application Document 6.1), congestion on the existing A303 and connecting roads is a source of severance for both Motorised Travellers and Non-Motorised Users, affecting access across the A303 or connecting roads within villages such as Winterbourne Stoke and Shrewton. It also reduces access along the A303 for Motorised Travellers to services in larger communities such as Amesbury or further afield. The upgraded A303 would allow east-west journeys through the Scheme to take less time, be more reliable and resilient, thereby improving the driver experience and reducing driver stress. The improvements to travel times along the route, which would benefit all Motorised Travellers, are as per NPSNN paragraph 2.2 of this Appendix.</p> <p>The Scheme would also reduce severance for NMUs. As part of the package of improvements to Non-Motorised User routes (as described in 3.17, above), the former A303 route through the WHS would be downgraded to a route for NMUs, approximately 4.2km in length. This route would reduce severance between Winterbourne Stoke</p>	<p>The summary of oral submissions at ISH6 [REP4-034] considered the development of key PRoW proposals within the Scheme which had been queried by interested parties and explained why they are necessary, further to this policy. This built on Highways England's response to Ag1.4 [REP2-022] its responses to the FWQ questions on the Tr Topic [REP2-036] and the responses to written representations [REP3-013]. See also the Closing Submission and the responses to Mr Roger Upfold and the British Horse Society at Deadline 8 [REP8-013] and 9 [REP9-022].</p>

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		<p>and Amesbury for Non-Motorised Users.</p> <p>Section 6.5 of the Transport Assessment (Application Document 7.4) indicates that the Scheme would not result in any changes to existing bus stops and would therefore have no direct impact on local bus routes.</p>	
3.20	<p>The Government expects applicants to improve access, wherever possible, on and around the national networks by designing and delivering Schemes that take account of the accessibility requirements of all those who use, or are affected by, national networks infrastructure, including disabled users. All reasonable opportunities to deliver improvements in accessibility on and to the existing national road network should also be taken wherever appropriate.</p>	<p>The Scheme is designed to provide improved access between London and the South West. The Highways England design standards and Scheme specific details are compliant with current national legislation set out under the Equality Act 2010 and associated Public Sector Equality Duty (PSED).</p> <p>Chapter 13 People and Communities of the Environmental Statement (Application Document 6.1) indicates that provision of a tunnel in the Stonehenge WHS and the conversion of the existing A303 to a restricted byway in this location would provide additional opportunity for recreational walking and cycling journeys for residents of Winterbourne Stoke, Shrewton and other villages in the River Till valley.</p> <p>To consider whether the Scheme design provides for inclusive transport options for all users, an Equality Impact Assessment (EqIA) (Application Document 7.3) has been undertaken of the Scheme. The EqIA is a predictive assessment tool which is designed to ensure that projects do not</p>	<p>The proposed restricted byways along the old A303 and the A360 do not discriminate against disabled users. In this context, the Applicant noted in its ISH6 [REP4-034] and ISH9 [REP8-017] submissions that users of mobility scooters are able to use restricted byways that form part of the Scheme.</p> <p>Changes to a public right of way at the Stonehenge Visitor Centre have been proposed both by the Applicant and interested parties and was discussed at ISH 9 (see written summary of oral submission [REP8-017]). These changes seek to further improve the amenity of walkers and cyclists following discussions within and outside of ISHs with stakeholders. The Examining Authority confirmed in its 27 September Procedural Decision [PD-021] acceptance of NMC-06 Option B and/or the related 'substitute solution' as described in chapter 5 of the Proposed Changes Consultation Report [REP8-015] and in chapter 5 of the Proposed Changes Position Statement submitted by the Applicant at Deadline 9 [REP9-027].</p> <p>As noted by Wiltshire Council at the Issue Specific Hearing 9, the proposal to create a restricted byway on the course</p>

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		<p>discriminate against or disadvantage people, and also considers how equality can be advanced. The EqIA concludes the Scheme design is likely to provide a range of benefits that would be shared by groups with protected characteristics.</p> <p>Children, younger people, older people and disabled users are all predicted to benefit from reduced community Severance caused by rat-running through villages surrounding the A303 when there is congestion on the A303. Winterbourne Stoke in particular would experience reduced severance due to the removal of the existing A303 from the village. The Scheme includes direct benefits such as improved facilities for NMU, benefitting cyclists, pedestrians and equestrian users and also provides a more reliable route for those with protected characteristics using private cars.</p> <p>Section D of the EqIA indicates that changes to journey times, local travel patterns, and certainty of route for NMUs would arise from the temporary closures and diversions of PRoWs. This impact would be mitigated by retention of the wider network of alternative available routes during construction. This should reduce construction impact on NMU users, however is it accepted that even minimal disruption can have an adverse impact on groups with mobility issues such as older people and people with disabilities. The</p>	<p>of the old A303 offers significantly better east-west connectivity for non-motorised users, and is in accordance with Wiltshire Council's Rights of Way Improvement Plan.</p>

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		routes for diversions would be agreed with Wiltshire Council.	
3.21	Applicants are reminded of their duty to promote equality and to consider the needs of disabled people as part of their normal practice. Applicants are expected to comply with any obligations under the Equalities Act 2010.	<p>As per NPSNN paragraph 3.19 and 3.20 of this Appendix.</p> <p>In addition to accessibility issues (considered in NPSNN Paragraph 3.20 of this Appendix), the EqIA (Application Document 7.5) and Heritage Impact Assessment (Application Document 6.3) consider the impact on other groups with protected characteristics. Stonehenge is of religious importance to Pagans and Druids. The Heritage Impact Assessment (Application Documents 6.3) concludes that the construction of the Scheme would not have a direct physical impact on any heritage assets that are considered spiritually significant to the pagan and druid groups consulted during preparation of the Heritage Impact Assessment. The Scheme is likely to have beneficial effects on the setting of several heritage asset groups with spiritual significance, as identified in the Heritage Impact Assessment.</p> <p>The Heritage Impact Assessment acknowledges that the spiritual experiences of the landscape are not confined to Asset Groups, or to cultural</p>	<p>The Applicant notes that this issue was raised in the context of the Trail Riders Fellowship's (TRF) concerns with regard to the Byways 11 and 12 issue.</p> <p>The Applicant has considered this in its ISH submissions [REP4-034] and [REP8-017] and in its Deadline 4a submission [REP4a-001] which confirmed that as the Scheme does not affect Byway 12 (i.e. no further prohibitions), users will still be able to access Stonehenge.</p> <p>In the same submissions, the Applicant noted the need for Wiltshire Council (who since withdrew their suggested changes) and TRF (who have not done so except at a high level) to fully consider these issues when considering its proposed changes to the Scheme.</p> <p>Furthermore, in its ISH submissions [REP4-034] and [REP8-017] and in its Deadline 4a submission [REP4a-001] the Applicant confirmed its view that no severance is caused by there being no link between Byways 11 and 12; given the alternative routes available for motorcyclists and the fact that non-motorised users, including the disabled, are able to continue to use the existing A303 that will be converted to a restricted byway.</p>

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		<p>heritage assets.</p> <p>Archaeological sites, combined with flora and fauna, landforms, places of personal and collective memory, and peoples' individual beliefs, contribute to a landscape which, for some, fosters contemplation and spiritual practices. Although the new tunnel introduces modern infrastructure into the land, with deep cuttings and portals, the removal of the existing A303 surface route would result in a beneficial impact on spiritual experiences and practices within the landscape as a whole.</p>	
3.22	<p>Severance can be a problem in some locations. Where appropriate applicants should seek to deliver improvements that reduce community severance and improve accessibility.</p>	<p>As per NPSNN paragraph 3.19 of this Appendix, the impact of the Scheme on severance is assessed in Chapter 13 People and Communities of the Environmental Statement (Application Document 6.1). Once operational, the Scheme would overall reduce severance, and benefit NMU. In addition, the Scheme would result in permanent relief from the vehicular user severance caused by congestion on the A303.</p>	<p>The Applicant notes that this issue was raised in the context of the TRF's concerns with regard to the Byways 11 and 12 issue.</p> <p>The Applicant has considered this in its ISH submissions [REP4-034] and [REP8-017] and in its Deadline 4a submission [REP4a-001] where the Applicant confirmed its view that no severance is caused by there being no link between Byways 11 and 12; given the alternative routes available for motorcyclists and the fact that non-motorised users are able to continue to use the existing A303 that will be converted to a restricted byway.</p>

Table 2 NPS Chapter 4

NPS Paragraph Number	Requirement of the National Policy Statement for National Networks (NPS)	Compliance with the NPS	Update as at Close of Examination
4	ASSESSMENT PRINCIPLES		
4.3	<p>In considering any proposed development, and in particular, when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State should take into account:</p> <ul style="list-style-type: none"> - its potential benefits, including the facilitation of economic development, including job creation, housing and environmental improvement, and any long-term or wider benefits; - its potential adverse impacts, including any longer- term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts 	<p>Chapter 5 of this Case for the Scheme document provides an overview of the transport, economic, cultural heritage, community and environmental benefits associated with the Scheme. The Scheme offers a uniquely effective solution to the two key challenges – congestion on the A303 and the impacts of the road and traffic on the WHS. It will remove a long-standing bottleneck for road users, helping to create a high performing dual carriageway route to the South West, supporting the local and regional economy. With part of the road in a tunnel, the Scheme will also remove a large section of the A303 from the most sensitive part of the WHS, allowing the two parts of the site to be reconnected. The tunnel, deep cuttings and related mitigation measures will reduce visual intrusion and the sound from traffic within the WHS, enhancing its enjoyment and important views within the prehistoric landscape. The Scheme will reduce traffic impacts on Winterbourne Stoke, reduce rat-running in other local settlements, and improve the resilience and safety of this part of the strategic road network.</p> <p>Section 5 of this Appendix addresses the impact</p>	<p>Please see the Closing Submission, which considers the Examination submissions to reinforce the conclusions made in the Case for the Scheme, that the Scheme benefits are many, and heavily outweigh its few adverse impacts.</p>

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		<p>assessments required by the NPSNN and the conclusions of the assessment of adverse effects, including those residual adverse effects presented in the Environmental Statement. Based on the information presented to respond to Section 5 of this Appendix, it is concluded that the Scheme does not cause any adverse effects that, considered individually, cumulatively or as a whole are so severe that the decision maker should refuse the application.</p> <p>The Non-Technical Summary of the Environmental Statement (Application Document 6.4) also provides a summary of the residual significant environmental effects, including benefits arising from the Scheme.</p>	
General principles of assessment – Business Case			
4.5	Applications for road and rail projects (with the exception of those for SRFIs, for which the position is covered in paragraph 4.8 below) will normally be supported by a business case prepared in accordance with Treasury Green Book principles. This business case provides the	The Scheme's business case has been developed in line with the Government's requirements set out in the HM Treasury's Green Book, as well as Department for Transport Business Case guidance and WebTAG guidance. This has informed the economic case for the Scheme, which is presented within Chapter 5 of this document, and the transport economics presented within ComMA Appendix D: Economic Appraisal Package (Application	The role of the information provided in the CoMMA submitted with the application, in particular the Contingent Valuation Study in respect of this paragraph of the NPS and how this interacts with the investment decision for the Scheme is set out in the response to SWQ TR2.3 [REP6-032] and further details are provided in the in responses to Stonehenge Alliance and Mr Morris throughout the Examination [REP4-036, REP5-003 and REP7-021].

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	<p>basis for investment decisions on road and rail projects. The business case will normally be developed based on the Department’s Transport Business Case guidance and WebTAG guidance. The economic case prepared for a transport business case will assess the economic, environmental and social impacts of a development. The information provided will be proportionate to the development. This information will be important for the Examining Authority and the Secretary of State’s consideration of the adverse impacts and benefits of a proposed development. It is expected that NSIP Schemes brought forward through the development consent order process by virtue of Section 35 of the Planning Act 2008, should</p>	<p>Document 7.5). It presents the anticipated benefits and dis-benefits associated with the Scheme. The economic benefits include savings in journey times, fuel and accidents, air quality benefits, taxation impacts, improved journey time reliability and wider economic impacts. The wider economic benefits also include the economic value of removing the road from the WHS. Chapter 5 concludes that taking into account the wider economic, journey time reliability and cultural heritage impacts of the scheme, the adjusted Net Present Value (NPV) is calculated at approximately £150 million.</p>	

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	also meet this requirement.		
Local transport model			
4.9	The Examining Authority should only recommend, and the Secretary of State should only impose, requirements in relation to a development consent, that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. Guidance on the use of planning conditions or any successor to it, should be taken into account where requirements are proposed.	<p>The draft Development Consent Order (DCO) (Application Document 3.1) includes proposed Requirements which are considered to be necessary, relevant, enforceable, precise and reasonable and has taken into account guidance on the use of planning conditions.</p> <p>The Explanatory Memorandum (Application Document 3.2) explains the purpose and effect of each provision in the draft DCO, including the requirements.</p>	<p>The draft DCO has been updated during the course of the Examination in response to comments from the Panel and interested parties. An updated draft was submitted at Deadline 9 [REP9-003].</p> <p>The Explanatory Memorandum has been updated for Deadline 9 [REP9-007] and a document explaining any changes to the dDCO has been provided with each updated dDCO. In respect of the final DCO at Deadline 9, the accompanying explanation of changes document [REP9-024] also responds to the Examining Authority's DCO [PD-018] and sets out which of the Examining Authority's changes have or have not been incorporated into the DCO and why.</p>
4.10	Planning obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly related to the proposed development and fairly and reasonably related in scale and kind to the development	The parameters for a section 106 agreement with Wiltshire Council are being considered and will be informed by the Statement of Common Ground with the Council. Any obligations which are specified within this Section 106 agreement will be in accordance with this policy, and therefore would be capable of being material to the Secretary of State's consideration of the DCO application.	The Applicant can now confirm that a S106 Agreement is not required but that a legal agreement is to be entered into with Wiltshire Council.

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Environmental Impact Assessment			
4.15	<p>All proposals for projects that are subject to the European Union's Environmental Impact Assessment Directive and are likely to have significant effects on the environment, must be accompanied by an environmental statement (ES), describing the aspects of the environment likely to be significantly affected by the project. The Directive specifically requires an environmental impact assessment to identify, describe and assess effects on human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 sets out the information that</p>	<p>An Environmental Statement has been prepared in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Statement presents a description of the Scheme, the likely significant environmental effects of the Scheme, the measures to avoid or reduce such effects and the alternatives considered. Chapter 4 Environmental Assessment Methodology of the Environmental Statement (Application Document 6.1) sets out the approach taken to prepare the EIA.</p>	<p>Clarifications and queries on the Environmental Statement [Application Document 6.1] have been considered throughout the course of the Examination and updates have been provided where necessary following discussions with stakeholders including Wiltshire Council, the EA and HMAG.</p>

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	<p>should be included in the environmental statement including a description of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the project, and also the measures envisaged for avoiding or mitigating significant adverse effects. Further guidance can be found in the online planning portal. When examining a proposal, the Examining Authority should ensure that likely significant effects at all stages of the project have been adequately assessed. Any requests for environmental information not included in the original environmental statement should be proportionate and focus only on significant effects. In this NPS,</p>		

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	the terms 'effects', 'impacts' or 'benefits' should accordingly be understood to mean likely significant effects, impacts or benefits.		
4.18	In some instances it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case.	<p>Detail of the Scheme design is shown on the Works Plans and the Engineering Section Drawings (Application Document 2.5, 2.7 and 2.8) and the Chapter 4 of this Case for the Scheme document. The Scheme involves linear and non-linear works. The draft DCO (Application Document 3.1) provides for limits of deviation both laterally and vertically. The purpose of this is to provide Highways England with a necessary, but proportionate degree of flexibility when constructing the Scheme. At this stage, all the land included in the Order limits is considered to be necessary to enable the delivery of the Scheme, as explained in the Statement of Reasons (Application Document 4.1).</p> <p>The maximum design parameters referenced in the draft DCO have been assessed in the Environmental Statement (Application Document 6.1). The realistic worst 'case scenario' has been applied for the EIA. Additionally, where there are elements of the</p>	<p>The parameters of the assessment detailed in chapter 2 of the Environmental Statement align with the limits of deviation which are set out in Article 7 of the draft DCO issued at Deadline 9 [REP9-003]. The only change to the limits of deviation has been to limit the downwards extent by which Work No.1F may deviate, which was previously unlimited.</p> <p>As noted under section 3.3 of the written summary of oral submissions put at the draft DCO hearing on 30th August 2019 [REP8-019], the limits of deviation have been assessed in the particular sensitive circumstances of the WHS, examined in detail and tested throughout the examination of the Scheme. This thorough assessment means that if the Order is made, the exercise of the limits of deviation (detailed in Article 7 of the draft DCO issued at Deadline 9 [REP9-003]) can be included in the Order by the Secretary of State with full confidence of the environmental effects that would result from their exercise and that they are robust and are acceptable. With that knowledge, there is no justification for a further constraint on their exercise beyond the existing requirement that they are "necessary or convenient".</p>

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		Scheme which have not been finalised, or temporary works, the realistic 'worst case' scenario has been applied.	Both prior to and during the examination process the Applicant has worked closely with heritage partners and statutory consultees to agree controls regarding key aspects of the Scheme design. This has included significant development of the OEMP (final version issued at Deadline 9 [REP9-013]), including the inclusion of Design Vision, Design Principles and Design Commitments which are secured under requirement 4 of schedule 2 of the draft DCO. Detail is also set out within the OEMP in relation to the consultation and approval process for the progression of a number of environmental management documents (including the CEMP and associated environmental management plans, policies and strategies) and design development thereby securing consultee input into progression of the Scheme.
4.19	Where some details are still to be finalised, applicants are advised to set out in the environmental statement, to the best of their knowledge, what the maximum extent of the proposed development may be (for example in terms of site area) and assess the potential adverse effects which the project could have to ensure that the impacts of the project as it may be constructed have been properly assessed.		As detailed in 4.18 above

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4.20	Should the Secretary of State decide to grant development consent for an application where details are still to be finalised, this will need to be reflected in appropriate development consent requirements in the development consent order. If development consent is granted for a proposal and at a later stage the applicant wishes for technical or commercial reasons to construct it in such a way that it is outside the terms of what has been consented, for example because its extent will be greater than has been provided for in terms of the consent, it will be necessary to apply for a change to be made to the development consent.	The draft requirements contained in the draft DCO (Application Document 3.1) make provision for the detailed design of the Scheme in general accordance with the Works Plans and Engineering Section Drawings (Application Document 2.5, 2.7 and 2.8), subject to any variation agreed in writing by the Secretary of State on the basis that the changes would not give rise to any materially new or materially worse adverse environmental effects in comparison with those reported in the environmental statement.	Requirement 3 of the draft DCO now requires that the detailed design of the scheme is, subject to the limits of deviation, in accordance with the works plans and engineering section drawings, while still being subject to the same provision for variations. In addition to Requirement 3, the OEMP, to be certified with the DCO and secured by Requirement 4, sets out a number of design commitments in respect of the Scheme, and, in section 4, the design vision and a series of design principles which will inform the detailed design of the Scheme and a comprehensive engagement process to be followed with stakeholders on key parts of the Scheme as the detailed design develops.
Habitats Regulations Assessment			
4.22	...The applicant should seek the advice of Natural England and, where appropriate, for cross-boundary impacts, Natural Resources Wales and Scottish Natural Heritage to ensure that	Highways England has engaged with Natural England to ensure that the Scheme includes the requisite measures to avoid adversely affecting the integrity of the River Avon SAC and the Salisbury Plain SAC and Special Protection Area (SPA).	Highways England has continued to engage with Natural England throughout the process, and both parties have set out their relative positions in a Statement of Common Ground [AS-106]. As set out in that document, there remain no matters either under discussion or not agreed, including in respect of the impacts of the Scheme on

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	impacts on European sites in Wales and Scotland are adequately considered.	Appendix 8.25 Assessment of Implications on European Sites (AIES): Statement to Inform Appropriate Assessment of the Environmental Statement Appendices (Application Document 6.3) confirms that the DCO boundary of the project does not overlap with areas of devolved administrations nor with those of other EEA States.	European sites. The clarification note submitted as an Appendix to the Statement of Common Ground with Natural England [AS-106] provides further clarification and signposting to the relevant information required to inform the Appropriate Assessment. This has been agreed with Natural England.
4.23	Applicants are required to provide sufficient information with their applications for development consent to enable the Secretary of State to carry out an Appropriate Assessment if required. This information should include details of any measures that are proposed to minimise or avoid any likely significant effects on a European site. The information provided may also assist the Secretary of State in concluding that an appropriate assessment is not required because significant effects on European sites are sufficiently unlikely that they can be excluded.	In accordance with the Conservation of Habitats and Species Regulations 2017, a Habitats Regulations Assessment (“HRA”) Screening has been undertaken for each SPA and SAC which could be affected by the Scheme and this is set out in Appendix 8.24 The Likely Significant Effects Report of the Environmental Statement Appendices (Application Document 6.3) , Appendix 8.25 Assessment of Implications on European Sites (AIES): Statement to Inform Appropriate Assessment of the Environmental Statement Appendices (Application Document 6.3) sets out the second stage of the HRA process and has been undertaken with reference to Planning Inspectorate Advice Note Ten: Habitat Regulations Assessment relevant to Nationally Significant Infrastructure Projects (version 8, November 2017). Selection of the preferred route option also took	The Applicant's position remains that the Scheme would have no adverse effect on the integrity of any European sites alone or in combination with other projects and plans but that certain impacts need to be taken forward to Appropriate Assessment because there are likely to be significant impacts without any mitigation. Natural England agrees with this conclusion and this is set out in a Statement of Common Ground [AS-106]. As set out in that document, there remain no matters either under discussion or not agreed, including in respect of the impacts of the Scheme on European sites. The clarification note submitted as an appendix to the Statement of Common Ground with Natural England [REP7-011] provides further clarification and signposting to the relevant information required to inform the Appropriate Assessment. Various additional supplementary and clarificatory information has also been provided during the examination, particularly in relation to the Applicant's proposals to provide and maintain stone curlew breeding plots. These have been

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		<p>HRA screening into account, and was informed by an earlier HRA screening assessment.</p> <p>Appendix 8.24 The Likely Significant Effects Report of the Environmental Statement Appendices (Application Document 6.3) and Appendix 8.25 Assessment of Implications on European Sites (AIES): Statement to Inform Appropriate Assessment of the Environmental Statement Appendices (Application Document 6.3) provide sufficient information to enable the Secretary of State for Transport (and the Planning Inspectorate, acting on its behalf) to determine whether an appropriate assessment is required and to undertake the assessment pursuant to Regulation 63(2) of the Conservation of Habitats and Species Regulations 2017. This includes measures to avoid any likely significant effects. As described within Appendix 8.24 The Likely Significant Effects Report of the Environmental Statement Appendices likely significant effects on the River Avon SAC, Salisbury Plain SAC, and Salisbury Plain SPA could not be dismissed.</p> <p>For all three European sites, impacts have been taken forward to Appropriate Assessment because there are likely to be significant impacts without any</p>	<p>identified in the ExA's Report on the Implications for European Sites [PD-019]. The Applicant's response to the ExA's Rule 17 request for further information dated 3 September [PD-017] is also relevant in this regard. The Applicant considers that sufficient information has been provided to allow the Secretary of State to undertake an appropriate assessment.</p>

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		<p>mitigation, and so the appropriate assessment takes the proposed mitigation into account in forming a conclusion regarding effects on integrity.</p> <p>Appendix 8.25 Assessment of Implications on European Sites (AIES): Statement to Inform Appropriate Assessment of the Environmental Statement Appendices (Application Document 6.3) indicates that following the inclusion and implementation of the mitigation measures set out and discussed in the Statement to Inform, the Scheme would have no adverse effect on the integrity of any European sites alone or in combination with other projects and plans.</p>	
4.24	<p>If a proposed national network development makes it impossible to rule out an adverse effect on the integrity of a European site, it is possible to apply for derogation from the Habitats Directive, subject to the proposal meeting three tests. These tests are that no feasible, less-damaging alternatives should exist, that there are imperative reasons of overriding public interest for the proposal going ahead, and that adequate and timely compensation measures will be put</p>	<p>Appendix 8.25 Assessment of Implications on European Sites (AIES): Statement to Inform Appropriate Assessment of the Environmental Statement Appendices (Application Document 6.3) has demonstrated that the Scheme would not have adverse effects on the integrity of any European sites, and this paragraph of the NPSNN is therefore not applicable.</p>	<p>The Applicant's position remains that the Scheme would have no adverse effect on the integrity of any European sites alone or in combination with other projects and plans. Natural England agrees with this conclusion and this is set out in a Statement of Common Ground [AS-106]. As set out in that document, there remain no matters either under discussion or not agreed, including in respect of the impacts of the Scheme on European sites. The Applicant has responded to the ExA's Rule 17 request for further information (dated 3 September 2019) reiterating why the replacement of stone curlew plot is mitigation and not compensation. As such, this paragraph of the NPSNN remains not applicable.</p>

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	in place to ensure the overall coherence of the network of protected sites is maintained.		
Alternatives			
4.26	<p>Applicants should comply with all legal requirements and any policy requirements set out in this NPS on the assessment of alternatives. In particular:</p> <ul style="list-style-type: none"> - The EIA Directive requires projects with significant environmental effects to include an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects. - There may also be other specific legal requirements for the consideration of alternatives, for example, under the Habitats and Water 	<p>Chapter 3 Assessment of Alternatives of the Environmental Statement (Application Document 6.1) sets out the main alternatives considered and how the preferred option was determined through consideration of environmental effects. Table 3-1 identifies those route options which were not taken forward, and environmental and other reasons why these were not progressed. Chapter 3 of this Case for the Scheme document also sets out the alternative options considered and how the preferred option was determined.</p> <p>In terms of other specific legal requirements for the consideration of alternatives:</p> <ul style="list-style-type: none"> - Appendix 11.2 Water Framework Directive Compliance Assessment of the Environmental Statement Appendices (Application Document 6.3) demonstrates that the Scheme does not lead to any deterioration in the status of any quality element for surface or ground water bodies; nor would it lead to a delay in 	<p>The Technical Appraisal Report [REP1-031 to 038] and Scheme Assessment Report [REP1-023 to 030] were submitted at Deadline 1 and provide further detailed information on the process undertaken to identify and assess alternatives. This information was taken into account in the EIA.</p>

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	<p>Framework Directives.</p> <ul style="list-style-type: none"> - There may also be policy requirements in this NPS, for example the flood risk sequential test and the assessment of alternatives for developments in National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB). 	<p>compliance of WFD objectives for the relevant water bodies. As such, the alternatives test under the WFD is not engaged.</p> <ul style="list-style-type: none"> - Appendices 8.24 and 8.25 of the Environmental Statement (the Assessment of Implications for European Sites, Application Document 6.3) was produced to comply with the Habitat Regulations and concludes that no likelihood of significant effects, or no adverse effect on the integrity of the relevant European Site arises from the Scheme. As such, the alternatives test under these Regulations is not engaged. - The Statement of Reasons (Application Document 4.1) considers the application of the alternatives test in a compulsory acquisition context; and demonstrates that all of the permanent land within the Order limits is required for the Scheme and that no alternative exists to the compulsory acquisition proposed. <p>Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement (document 6.3) details the application of the sequential test. The Scheme is not located within a National Park, the Broads or an Area of Outstanding Natural Beauty.</p>	

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4.27	<p>All projects should be subject to an options appraisal. The appraisal should consider viable modal alternatives and may also consider other options (in light of the paragraphs 3.23 to 3.27 of this NPS). Where projects have been subject to full options appraisal in achieving their status within Road or Rail Investment Strategies or other appropriate policies or investment plans, option testing need not be considered by the examining authority or the decision maker. For national road and rail Schemes, proportionate option consideration of alternatives will have been undertaken as part of the investment decision making process. It is not necessary for the Examining Authority and the decision maker to reconsider this process, but they should be satisfied that this assessment has been undertaken.</p>	<p>Prior to the A303's inclusion within the Government's Road Investment Strategy, the Government Office for the South West produced the <i>London to South West and South Wales Multi Modal Study (SWARMMS)</i> (2012), which considered alternative modes of transport on the wider transport network in the area, included on the rail network in order to improve transport connections between the south west, south wales and London. This included consideration of a multi-modal transport corridor including rail and road connections between London and Exeter, London and Bristol & Severn Estuary, Bristol and Exeter, and Exeter and Penzance. The primary alternative mode for the dominant long-distance trips on the A303 corridor would be rail. The SWARMMS strategy identified improvements required to these lines, and a number of these have been implemented. Whilst further improvements would deal with existing capacity and speed issues, it would be impossible for a rail improvement to entirely solve the identified problems in the Scheme location.</p> <p>Prior to options identification, the A303 was included within the Department for Transport (DfT) Road Investment Strategy (December 2014), in which the</p>	<p>The Technical Appraisal Report [REP1-031 to 038] and Scheme Assessment Report [REP1-023 to 030] were submitted at Deadline 1 and provide further detailed information on the process undertaken to identify and assess alternatives, including alternative solutions.</p>

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		<p>DfT committed to undertaking feasibility study for the A303 to “<i>help identify and fund solutions to tackle some of the most notorious and long-standing road hot spots in the country</i>”. The commitment was to undertake “<i>construction of a twin-bored tunnel at least 1.8 miles long as the road passes Stonehenge and a bypass for Winterbourne Stoke to link the existing dual carriageway section around Amesbury with the dual carriageway at Berwick Down.</i>”</p> <p>The Scheme options were appraised as per the response to NPSNN Paragraph 4.26 of this Appendix. The process for options identification was undertaken through several stages, and involved a full options appraisal, as described within Section 3.2, Chapter 3 of the Environmental Statement Chapter 3 (Application Document 6.1). The process of options identification and route selection leading to the Scheme is summarised below. The process followed the following stages:</p> <ul style="list-style-type: none"> - Corridor identification and initial sifting of corridors (Stage 1); - Design development of route options within preferred corridors (Stage 2); - Route options appraisal and sifting to identify options to take forward for further appraisal 	

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		<p>(Stage 3);</p> <ul style="list-style-type: none"> - The selection of two preferred routes, which were taken to non-statutory public consultation in January/March 2017 (Stage 4); - The selection of a Preferred Route which was announced by the Secretary of State in September 2017 and which forms the basis of the Scheme (Stage 5). <p>The Secretary of State announced the Preferred Route on 12th September 2017 and it is this route which forms the basis for the Scheme. Full details of the earlier work undertaken to inform the Secretary of State’s decision, including options identification and selection process and the development of the Preferred Route can be found in the Scheme Assessment Report which was published prior to this application: https://highwaysengland.citizenspace.com/cip/a303-stonehenge/</p> <p>Section 8.5 of the Transport Assessment (Application Document 7.4) considers whether an alternative modal intervention could solve the problem (including congestion on the A303).</p> <ul style="list-style-type: none"> - Walking, cycling and local public transport are 	

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		<p>not viable alternatives to car use for most of the journeys made on this section of the A303 due to the trip lengths that are involved.</p> <ul style="list-style-type: none"> - Coach is a possible alternative for some journeys between urban centres. <p>However, the frequencies of services to major destinations in the South West are low and coaches using the A303 would be subject to the same delays as cars. Hence, where a car is available, using the coach is relatively unattractive for most users of the A303. Also, the capacity of the coach services provided is relatively small in comparison with the number of people that can be accommodated in vehicles using an improved dual carriageway.</p> <ul style="list-style-type: none"> - Rail is considered the only modal alternative which can seriously compete with road for the types of journey being made by A303 road users. However, there is no planned or prospective rail scheme or investment which would offer a solution to existing and future anticipated traffic problems. - 	

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Criteria for “good design” for national network Infrastructure			
4.28	<p>Applicants should include design as an integral consideration from the outset of a proposal.</p>	<p>Chapter 4 'Design Evolution and Engagement' of the DAS (Application Document 7.2) clearly demonstrates that sufficient consideration was given to the assessment of key design opportunities and challenges at the outset of the project and that these have been used to inform the design. They include the unique nature of the WHS as well as numerous other factors within the surrounding landscape context.</p> <p>Stakeholder engagement was entered into early in the design process and has formed an integral part of the design development process. The design has been developed with input from stakeholders. Chapter 4 Design Evolution and Engagement of the DAS (Application Document 7.2) sets out this process in further detail.</p> <p>The Scheme was presented to Highway England’s Strategic Design Panel. This is an independent design review panel which draws on members from numerous organisations including the Design Council. Where reasonably practicable, comments made by the panel have been incorporated into the Scheme. Further information on this process can be</p>	<p>A design vision and set of design principles and commitments has been set out in the OEMP, Section 4 to guide the detailed design stage, an updated version of which was submitted at Deadline 9 [REP9-013] further to discussions with stakeholders. As is explained in the OEMP, and was explained across the set of second Issue Specific Hearings, this design vision has informed the design of the Scheme presented at application and will continue to do so as it moves into detailed design if the DCO is made.</p>

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		<p>found in Chapter 4 Design Evolution and Engagement of the DAS (Application Document 7.2).</p> <p>In response to the key opportunities and challenges, the stakeholder engagement process and comments received via the design panel, Highways England developed a set of high level design principles which have been used to guide the design approach to date. These have been set out in Chapter 5 High Level Design Principles and Design Guide of the DAS (Application Document 7.2).</p>	
4.29	<p>Visual appearance should be a key factor in considering the design of new infrastructure, as well as functionality, fitness for purpose, sustainability and cost. Applying “good design” to national network projects should therefore produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction, matched by an appearance that demonstrates good aesthetics as</p>	<p>The overarching design rationale for the Scheme has been driven by the unique nature of the WHS and the surrounding landscape. The high level design principles (which can be found in Chapter 5 High Level Design Principles and Design Guide of the DAS (Application Document 7.2)) which have informed elements of the design of the Scheme include the aim of integrating the Scheme into the landscape with minimal visibility as a key design factor. Chapter 6 Design Rationale of the DAS demonstrates how the Scheme appearance would achieve the design principles in providing good aesthetics that are also sensitive to place. This design has been prepared in accordance with</p>	<p>A design vision and set of design principles and commitments has been set out in the OEMP, Section 4, to guide the detailed design stage, an updated version of which was submitted at Deadline 9 [REP9-013] further to discussions with stakeholders.</p> <p>Compliance with the NPS is one of the purposes of the Vision - as set out in paragraph 4.2.5(e) of the OEMP, one of its purposes is to: “demonstrate how the detailed design will take account of the criteria for good design as set out in the National Policy Statement for National Networks, to ensure it is sustainable infrastructure, sensitive to its place, efficient in the use of natural resources and energy used in their construction, matched by an appearance that demonstrates good aesthetics as far as possible”. This vision, and the Design principles</p>

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	far as possible.	<p>Commission for Architecture and the Built Environment (2016) guidance.</p> <p>Functional requirements of the Scheme, as a highways infrastructure project, are led by technical documents setting out parameters for new road design, such as DMRB and the costs involved in those design elements. The relevant technical documents are referenced in Chapter 3 Design Policy Context of the DAS (Application Document 7.2). Chapter 6 Design Rationale of the DAS provides a brief description of how the highways design elements has evolved as a result of meeting DMRB requirements. Compliance with these requirements will ensure the Scheme is fit for purpose.</p> <p>Chapter 6 Design Rationale of the DAS (Application Document 7.2) sets out general principles relating to sustainability and climate change that have informed the Scheme design. For example this has led to the design of the River Till viaduct being developed to avoid impact on flood risk and shading to ecological receptors. Further, the drainage design, an outline of which is set out indicatively in the Road Drainage Strategy (Appendix 11.3 of Application Document 6.3 (ES Appendices) would seek to ensure that the</p>	derived from it, will guide the detailed design for the Scheme.

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		<p>drainage design would be integrated sympathetically into the landscape and be designed for future flows taking account of climate change. Further information on embedded sustainable design can also be found in Chapter 6 Design Rationale of the DAS.</p> <p>Also set out in Chapter 6 Design Rationale of the DAS (Application Document 7.2), the Scheme is aiming to achieve an excellent rating with the Civil Engineering Environmental Quality Assessment and Awards Scheme (CEEQUAL) sustainability rating scheme delivered by the Building Research Establishment (BRE).</p> <p>Chapter 6 Design Rationale of the DAS (Application Document 7.2) references materials generated through tunnel excavations being reused within the Scheme to reduce environmental impacts. Through efficient reuse of materials on site, the Scheme would deliver sustainable infrastructure. The materials which are reused would create a new chalk down landscape which is sensitive to the setting of the Scheme.</p>	
4.31	A good design should meet the principal objectives of the	Reference should also be made to the Scheme compliance response set out in NPSNN Paragraphs	A design vision and set of design principles and commitments has been set out in the OEMP, Section 4,

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	<p>scheme by eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts. It should also mitigate any existing adverse impacts wherever possible, for example, in relation to safety or the environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as is practicable, taking into account capital cost, economics and environmental impacts.</p>	<p>4.28 and 4.29 of this Appendix.</p> <p>Chapter 2 Scheme Background of the DAS (Application Document 7.2) sets out the objectives for the Scheme which have been developed to address identified problems and take advantage of the opportunities that this new infrastructure would provide. In design terms, the Scheme is considered to address the following:</p> <p>Transport: The Scheme has been designed to meet requirements of technical documents which set out parameters for new road design, such as DMRB referenced in Chapter 3 Design Policy Context of the DAS (Application Document 7.2). In doing so, this would contribute towards providing a high performing reliable route between the south east and south west that meets future needs. Chapter 6 Design Rationale of the DAS demonstrates how this would be achieved. Chapter 6 also sets out how the Scheme would provide a safer route than the existing, which would be more resilient to incidents. Overall, this would result in an improvement to operational conditions.</p> <p>Economic growth: The Scheme design would provide an improvement to the existing operating conditions of the A303. This would provide a</p>	<p>to guide the detailed design stage, an updated version of which was submitted at Deadline 9 [REP9-013] following discussions with stakeholders. These measures have been identified to minimise and mitigate adverse impacts on the surrounding environment.</p> <p>Furthermore principles P-G02 and P-G03 relate to the on-going operational performance - PG02 referring to a 'high performing dual carriageway to improve safety' and P-G03 stating that The design will consider resilience to climate change by incorporating future climate change allowances and using sustainable drainage solutions.</p>

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		<p>supporting role in enabling growth in jobs and housing through contributing to a free-flowing and reliable connection between the south east and the south west.</p> <p>Cultural heritage: Chapter 4 Design Evolution and Engagement of the DAS (Application Document 7.2) highlights the Scheme as presenting a significant opportunity to demonstrate exemplary design in its response to the significance of the WHS and its OUV. Along with numerous other heritage assets in and around the Scheme this has informed the high level design principles to which the Scheme has been developed. Chapter 6 Design Rationale of the DAS explains how the Scheme conserves and enhances the WHS, and makes it easier to reach and explore. Most significantly, the Scheme proposes a twin bore tunnel to remove a large section of the A303 route from the WHS, reconnecting the two halves. The Scheme has been designed with the aim of minimising adverse impact, for example, the location of the tunnel portals has been chosen to avoid impacting on heritage assets. Their visual impact is further reduced through provision of cut and cover canopies.</p> <p>Environment and community: Chapter 4 Design</p>	

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		<p>Evolution and Engagement of the DAS (Application Document 7.2) sets out the need to respond to constraints created by statutory and non-statutory ecological sites and protected species in and around the Scheme area, as well as protected landscapes designations and surrounding settlements. These have also informed the high level design principles to which the Scheme was developed. Chapter 6 Design Rationale of the DAS (Application Document 7.2) explains how design mitigation measures within the Scheme would improve biodiversity and provide a positive legacy for nearby communities.</p> <p>Chapter 6 Design Rationale of the DAS (Application Document 7.2) sets out how the Scheme has been designed with a long lifespan and the design takes into account potential for climate change. Chapter 4 Design Evolution and Engagement of the DAS makes reference to cost as a consideration in the design.</p>	
4.33	The applicant should therefore take into account, as far as possible, both functionality (including fitness for purpose and sustainability) and	<p>Reference should also be made to the Scheme compliance response set out in NPSNN Paragraphs 4.29 and 4.31 of this Appendix.</p> <p>Functional requirements of the Scheme, as a</p>	A design vision and set of design principles and commitments has been set out in the OEMP, Section 4, to guide the detailed design stage, an updated version of which was submitted at Deadline 9 [REP9-013] following discussions with stakeholders. This follows extensive engagement with the members of HMAG (to become

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	<p>aesthetics (including the Scheme's contribution to the quality of the area in which it would be located). Applicants will want to consider the role of technology in delivering new national networks projects.</p> <p>The use of professional, independent advice on the design aspects of a proposal should be considered, to ensure good design principles are embedded into infrastructure proposals.</p>	<p>highways infrastructure project, are led by technical documents setting out parameters for new road design, such as DMRB referenced in Chapter 3 Design Policy Context of the DAS. These technical documents are set out in Chapter 6 Design Rationale of the DAS, and the chapter provides a brief description of the highways design elements as a result of meeting DMRB requirements. Compliance with these requirements will ensure the Scheme is fit for purpose.</p> <p>The Scheme features technological equipment to enable operational monitoring and control of traffic during incidents and maintenance would be located along the length of the Scheme. This would include CCTV cameras and variable message signs to provide information to drivers.</p> <p>Stakeholder engagement was undertaken early in the design process and has formed an integral part of the design development process. The design has been developed with input from stakeholders. Chapter 4 Design Evolution and Engagement of the DAS sets out this process in further detail.</p> <p>The Scheme was presented to Highway England's Strategic Design Panel. This is an independent design review panel which draws on members from</p>	<p>SCDG) on these provisions and design generally</p> <p>The OEMP takes into account the functionality, aesthetics and changes in technology within the 'Vision' section of the document by including user experience and safety and sustainability and resilience within the aims of the Vision alongside the need to respond and respect the historic landscape and having a high quality and imaginative design (see paragraph 4.2.6). All of these aspects together have then informed the Design Principles.</p>

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		<p>numerous organisations including the Design Council. Where reasonably practicable, comments made by the design panel have been incorporated into the Scheme. Further information on this process can be found in Chapter 4 Design Evolution and Engagement of the DAS.</p> <p>The stakeholder engagement process and use of the strategic design panel demonstrates independent advice has been sought on the design aspects of the Scheme which has ensured good design principles have been embedded into the proposals.</p>	
4.34	<p>Whilst the applicant may only have limited choice in the physical appearance of some national networks infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting and design measures relative to existing landscape and historical character and function, landscape permeability, landform and vegetation.</p>	<p>Reference should also be made to the Scheme compliance response set out in NPSNN Paragraphs 4.28, 4.29 and 4.31 of this Appendix.</p> <p>Chapter 6 Design Rationale of the DAS (Application Document 7.2) demonstrates that Highways England has adopted an approach of high quality design in response to the key opportunities and challenges which influenced the design development have been set out in Chapter 4 Design Evolution and Engagement of the DAS. These include the WHS, historic landscape, protected landscapes, statutory and non-statutory ecological</p>	<p>Through the design vision, principles and commitments set out in the OEMP and the design parameters set out on the plans secured by Requirement 3, the Applicant has and will continue to demonstrate good design in terms of siting and design measures which takes account of the surrounding landscape and historical character and function, landscape permeability, landform and vegetation, see for example the numerous references to 'landscape character' within section 4 of the OEMP in Design Commitments and Principles such as MW-LAN5 (earthworks rounded to provide a natural appearance and reflect the surrounding topography and landscape character), P-PWS01 (all new infrastructure to be designed to be sympathetic with the surrounding</p>

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		<p>designations and proximity to nearby communities.</p> <p>As described in Chapter 6 Design Rationale of the DAS, embedded mitigation which has been identified as part of the EIA has also informed the design, including mitigation which ensures the Scheme responds to its context and minimises impact on landscape and historic settings. This is summarised in further detail in NPSNN paragraphs 4.31 and 4.33.</p>	<p>landscape character).</p> <p>These flow through from the Design Vision, which in the Scheme as a whole and in the different sections of the Scheme, seek to reflect the surrounding character, and in the WHS, its OUV (see paragraphs 4.2.6-4.2.11)</p>
Climate change adaptation			
4.38	<p>Adaptation is therefore necessary to deal with the potential impacts of these changes that are already happening. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the</p>	<p>Chapter 14 Climate of the Environmental Statement (Application Document 6.1) assesses the potential climate impacts of the construction and operation of the Scheme and details aspects of the design and mitigation measures during the proposed operation and construction to address these impacts. Section 14.8 identifies construction and operational design and management measures to address climate change effects.</p> <p>As specified within Chapter 14 Climate of the Environmental Statement, the proposed drainage systems include future climate change allowances to improve the A303's resilience to the risk of</p>	<p>The Statement of Common Ground [REP7-005] with the Environment Agency confirms that the climate change allowance methodology in the FRA is agreed (Ref 3.26) and that no outstanding matters are still to be agreed or are in discussion in relation to resilience of the Scheme to climate change.</p> <p>The Statement of Common Ground [REP7-015] with Wiltshire Council confirms that the climate change allowance methodology used in respect of groundwater and surface water flood risk, land drainage and road drainage is agreed (Refs 3.28.18, 3.28.19, 3.29.4) and that no outstanding matters are still to be agreed or are in discussion in relation to resilience of the Scheme to climate change.</p> <p>The updated Road Drainage Strategy [REP2-009]</p>

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	<p>provision of green infrastructure.</p>	<p>increased frequency of heavy precipitation.</p> <p>Construction mitigation measures include incorporation of current road design standards and future climate change allowances, adequate space within tunnels for anticipated future cooling and ventilation requirements. Operational measures include use of attenuation features to detain runoff from all events expected to occur with 1% annual probability or more frequently. Drainage attenuation measures, and the consideration of future flood risk scenarios with climate change allowances is described in the Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application Document 6.3).</p> <p>Section 8.8, Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1) describes how the Scheme would establish a network of green bridges and infrastructure.</p>	<p>incorporated current DMRB guidance on climate change. The detailed design will be undertaken in accordance with the principles set out in the OEMP, the Flood Risk Management Plan (MW-WAT12) will incorporate an appropriate climate change allowance in consultation with the Environment Agency.</p> <p>Chapter 14 Climate of the ES [APP-052] assesses the impact of climate change impacts and where necessary identifies appropriate measures to improve the resilience of the Scheme. The resilience assessment for the ES was undertaken using United Kingdom Climate Projections (UKCP09), the latest set of projection data available at the time the assessment was undertaken.</p> <p>Subsequently, updated climate projections (UKCP18) have been published and an updated assessment of the resilience of the Scheme undertaken. Response to the ExA Second Written Question CC 2.4 [REP6-025] presents the results of this assessment as well as a comparison between the climate change impacts identified using UKCP09 and UKCP18. It was concluded that the mitigation measures built into the design and assumed management practices identified in ES Chapter 14 Section 14.8 [APP-052] and ES Appendix 14.2 (Summary of climate impact effects) [APP- 289] are still appropriate and no additional impacts are expected as a result of the change in projections. The new projections do not affect the conclusions of Chapter 14.</p>

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4.40	<p>New national networks infrastructure will be typically long- term investments which will need to remain operational over many decades, in the face of a changing climate.</p> <p>Consequently, applicants must consider the impacts of climate change when planning location, design, build and operation. Any accompanying environment statement should set out how the proposal will take account of the projected impacts of climate change.</p>	<p>The UK Climate Projections 2009 (UKCP09) for temperature and precipitation variables have been obtained and analysed for the Scheme, and are summarised in Chapter 14 Climate of the Environmental Statement (Application Document 6.1).</p> <p>For the South West of England, there is projected to be an increase in annual temperatures and increased seasonality in rainfall, with wetter winters and drier summers expected. The mitigation requirements, which respond to these future scenarios are set out in NPSNN paragraph 4.38 of this Appendix, and are addressed within Chapter 14.</p>	<p>The Statement of Common Ground [REP7-005] with the Environment Agency confirms that the climate change allowance methodology in the FRA is agreed (Ref 3.26) and that no outstanding matters are still to be agreed or are in discussion in relation to resilience of the Scheme to climate change.</p> <p>The Statement of Common Ground [REP7-015] with Wiltshire Council confirms that the climate change allowance methodology used in respect of groundwater and surface water flood risk, land drainage and road drainage is agreed (Refs 3.28.18, 3.28.19, 3.29.4) and there are no outstanding matters are still to be agreed or are in discussion in relation to resilience of the Scheme to climate change.</p> <p>Subsequent to the completion of the ES, updated United Kingdom climate projections (UKCP18) have been published and an updated assessment of the resilience of the Scheme undertaken. Response to the ExA Second Written Question CC 2.4 [REP6-025] presents the results of this assessment as well as a comparison between the climate change impacts identified using UKCP09 and UKCP18. It was concluded that the mitigation measures built into the design and assumed management practices identified in ES Chapter 14 Section 14.8 [APP-052] and ES Appendix 14.2 (Summary of climate impact effects) [APP- 289] are still appropriate and no additional impacts are expected as a result of the change in projections. The new projections</p>

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			do not affect the conclusions of Chapter 14.
4.41	Where transport infrastructure has safety-critical elements and the design life of the asset is 60 years or greater, the applicant should apply the UK Climate Projections 2009 (UKCP09) high emissions scenario (high impact, low likelihood) against the 2080 projections at the 50% probability level.	As per NPSNN paragraph 4.40 of this Appendix.	As per NPSNN paragraph 4.40 of this Appendix.
4.42	The applicant should take into account the potential impacts of climate change using the latest UK Climate Projections available at the time and ensure any environment statement that is prepared identifies appropriate mitigation or adaptation	As per NPSNN paragraph 4.40 of this Appendix.	As per NPSNN paragraph 4.40 of this Appendix.

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	measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of any environment statement, the Examining Authority should consider whether they need to request additional information from the applicant.		
4.43	The applicant should demonstrate that there are no critical features of the design of new national networks infrastructure which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections. Any potential critical features should be assessed taking account of the latest credible scientific evidence on, for example, sea level rise (e.g. by referring to	Section 14.9, Chapter 14 Climate of the Environmental Statement (Application Document 6.1) indicates that the Scheme is designed to be resilient to impacts from weather events and climatic conditions and designed in accordance with current planning, design and engineering practice and codes. The assessment has found that, based on the mitigation built into the design and assumed management practices, as well as the UKCP09 climate change projections, information from other environmental disciplines, and details on Scheme design, that none of the potential impacts identified would be significant (and are therefore classed as non-significant). Appendix 14.1 Climate Resilience Baseline of the Environmental Statement Appendices (Application	The Statement of Common Ground [REP7-005] with the Environment Agency confirms that the climate change allowance methodology in the FRA is agreed (Ref 3.26) and that no outstanding matters are still to be agreed or are in discussion in relation to resilience of the Scheme to climate change. The Statement of Common Ground [REP7-015] with Wiltshire Council confirms that the climate change allowance methodology used in respect of groundwater and surface water flood risk, land drainage and road drainage is agreed (Refs 3.28.18, 3.28.19, 3.29.4) and that no outstanding matters are still to be agreed or are in discussion in relation to resilience of the Scheme to climate change. For the position on climate change for road drainage and

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	<p>additional maximum credible scenarios such as from the Intergovernmental Panel on Climate Change or Environment Agency) and on the basis that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime through potential further mitigation or adaptation.</p>	<p>Document 6.3) considers the potential range of changes in climate that might occur, and sets out the evidence considered to substantiate this. This indicates that the UKCP09 Weather Generator (WG) has been used to develop probabilistic daily weather conditions for the 2020s (2010-2039), the 2050s (2040- 2069) and the 2080s (2070-2099). The WG's Threshold Detector (TD) is a post- processing tool that can be applied to outputs from the WG. It allows users to investigate how often thresholds, such as temperatures or daily rainfall greater or less than a certain level, are likely to be exceeded in the future.</p> <p>Table 14.13, Chapter 14 Climate of the Environmental Statement (Application Document 6.1) identifies the construction and operational climate change resilience measures which are proposed. The assessment concludes, based on the mitigation built into the design and assumed management practices, as well as the UKCP09 climate change projections, information from other environmental disciplines, and details on Scheme design, that none of the potential impacts identified would be significant.</p>	<p>water, see the response to paragraph 4.38.</p> <p>In terms of the assessment of any potential critical features: subsequent to the completion of the ES, updated United Kingdom climate projections (UKCP18), have been published and an updated assessment of the resilience of the Scheme. Please refer to paragraph 4.40 above and also the Applicant's Response to the ExA Second Written Question CC 2.4 [REP6-025] which presents the outcomes of the UKCP18 based assessment.</p> <p>The assessment concluded that no additional climate change impacts are expected as a result of the change in projections. The new projections do not affect the conclusions of Chapter 14.</p> <p>Also as per NPSNN paragraph 4.40 of this Appendix.</p>
4.44	<p>Any adaptation measures should be based on the latest set of UK Climate Projections, the Government's national Climate Change Risk Assessment and</p>	<p>Chapter 14 Climate of the Environmental Statement (Application Document 6.1) concludes that based on the embedded mitigation (these adaptation measures are as described in NPSNN Paragraph 4.40 of this Appendix) built into the design and</p>	<p>The Statement of Common Ground [REP7-005] with the Environment Agency confirms that the climate change allowance methodology in the FRA is agreed (Ref 3.26) and that no outstanding matters are still to be agreed or are in discussion in relation to resilience of the Scheme to climate change.</p>

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	consultation with statutory consultation bodies. Any adaptation measures must themselves also be assessed as part of any environmental impact assessment and included in the environment statement, which should set out how and where such measures are proposed to be secured.	<p>assumed management practices, information from other environmental disciplines, details on scheme design, and taking into account UKCP09 Climate change projects, that none of the potential climate change impacts identified would be significant.</p> <p>Stakeholder comments provided on flood risk and water management that indirectly relate to climate resilience impacts can be found in Chapter 11 Road Drainage and the Water Environment of the Environmental Statement (Application Document 6.1).</p>	<p>The Statement of Common Ground [REP7-015] with Wiltshire Council confirms that the climate change allowance methodology used in respect of groundwater and surface water flood risk, land drainage and road drainage is agreed (Refs 3.28.18, 3.28.19, 3.29.4) and that no outstanding matters are still to be agreed or are in discussion in relation to resilience of the Scheme to climate change.</p> <p>For the position on climate change for road drainage and water, see the response to paragraph 4.38.</p> <p>Also as per NPSNN paragraph 4.40 of this Appendix.</p>
4.45	If any proposed adaptation measures themselves give rise to consequential impacts the Secretary of State should consider the impact in relation to the application as a whole and the impacts guidance set out in this part of this NPS (e.g. on flooding, water resources, biodiversity, landscape and coastal change).	The adaptation measures which are proposed are not expected to give rise to any adverse consequential impacts.	The DCO and OEMP (in particular, please note MW-G5, MW-G7, MW-WAT2, MW-WAT12 and MW-WAT13) have been drafted to require the Environment Agency and Wiltshire Council be consulted on the relevant aspects of detailed design, construction methods, CEMPs (and sub plans) and any subsequent risk assessment and mitigation measures.
4.46	Adaptation measures can be required to be implemented at the	Table 14.13, Chapter 14 Climate of the Environmental Statement (Application Document 6.1)	The DCO and OEMP have been drafted to require the Environment Agency and Wiltshire Council be consulted

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	time of construction where necessary and appropriate to do so.	describes where adaptation measures would be implemented at the time of construction.	on the relevant aspects of detailed design, construction methods, CEMPs and any subsequent risk assessment and mitigation measures. Updated versions were submitted at Deadline 9 [REP9-003 and REP9-013].
Pollution control and other environmental protection regimes			
4.48	Issues relating to discharges or emissions from a proposed project which affect air quality, water quality, land quality and the marine environment, or which include noise and vibration, may be subject to separate regulation under the pollution control framework or other consenting and licensing regimes. Relevant permissions will need to be obtained for any activities within the development that are regulated under those regimes before the activities can be operated.	Details of other regulatory consents to be sought for the Scheme are set out in the Consents and Agreements Position Statement (Application Document 3.3).	An updated Consents and Agreements Position Statement was submitted at Deadline 6 [REP6-007].
4.50	In deciding an application, the Examining Authority and the Secretary of State should focus on whether the development itself is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. They should assess	Chapter 7 and Appendix B of this Case for the Scheme document sets out how the Scheme conforms to planning policy and is an acceptable use of the land. The impacts of that use are considered throughout the Environmental Statement (Application Document 6.1). Details of other regulatory consents to be sought for the Scheme are set out in The Consents and	An updated Consents and Agreements Position Statement was submitted at Deadline 6 [REP6-007].

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	the potential impacts of processes, emissions or discharges to inform decision making, but should work on the assumption that in terms of the control and enforcement, the relevant pollution control regime will be properly applied and enforced. Decisions under the Planning Act should complement but not duplicate those taken under the relevant pollution control regime.	Agreements Position Statement (Application Document 3.3).	
4.53	When an applicant applies for an Environmental Permit, the relevant regulator (the Environment Agency) requires that the application demonstrates that processes are in place to meet all relevant Environmental Permit requirements...	<p>The Consents and Agreements Position Statement (Application Document 3.3) identifies the separate water Environmental Permits that will be pursued separate and subsequent to the application for development consent including those under the Environmental Permit requirements, and includes Consent for discharge to controlled water and/ or groundwater in accordance with Environmental Permitting (England and Wales) Regulations 2016.</p> <p>As further detailed in the Consents and Permissions Statement, Highways England has discussed with the Environment Agency its intention to seek any required Environmental Permits following the detailed design of the Scheme when the level of information necessary to support an application for an Environmental Permit will be available. From those discussions, Highways England is not aware of any good reason to believe that such permits would not</p>	<p>An updated Consents and Agreements Position Statement was submitted at Deadline 6 [REP6-007]. Highways England is still not aware of any good reason to believe that such permits would not be granted in due course.</p> <p>The Statement of Common Ground [REP7-005] with the Environment Agency outlines (Ref 3.1) that the DCO and OEMP have been drafted to require that the Environment Agency be consulted on the relevant aspects of detailed design, construction methods, CEMPs and any subsequent risk assessment and mitigation measures. This consultation process will inform any subsequent regulatory applications.</p>

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		be granted in due course.	
4.54	<p>Applicants are encouraged to begin pre-application discussions with the Environment Agency as early as possible. It is however expected that an applicant will have first thought through the requirements as a starting point for discussion. Some consents require a significant amount of preparation; as an example, the Environment Agency suggests that applicants should start work towards submitting the permit application at least 6 months prior to the submission of an application for a Development Consent Order, where they wish to parallel track the applications. This will help ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the Examining Authority.</p>	<p>As described within the Consents and Agreements Position Statement (Application Document 3.3), the approach to discharging Environmental Permits after the grant of the Development Consent Order has been discussed with the Environment Agency. Discussions within the Environment Agency regarding the disapplication of environmental permits regarding the following pollution control regimes is ongoing:</p> <ul style="list-style-type: none"> - Environmental permit for working on or near a main river under Water Act 2014 and Environmental Permitting (England and Wales) Regulations 2016 - Working around a water source protection area under Environmental Permitting (England and Wales) Regulations 2016 - Dewatering/discharge of water from excavations under the Land Drainage Act 1991 <p>Negotiations for the agreement of disapplications and associated Protective Provisions will continue ahead of DCO examination. Agreement on Protective Provisions will be captured in the Statement of Common Ground being prepared with the Environment Agency.</p> <p>Should agreement on disapplication not be reached, formal application for consent will commence</p>	<p>An updated Consents and Agreements Position Statement was submitted at Deadline 6 [REP6-007]. Highways England is still not aware of any good reason to believe that such permits would not be granted in due course.</p> <p>The disapplication of bylaws made under, or having effect as if made under, paragraphs 5, 6 or 6A of Schedule 25 to the Water Resources Act 1991 and the disapplication of regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016 in respect of 'flood risk activity' only, are agreed and the Agency has indicated in its submissions that it consents to those disapplications under section 150 Planning Act 2008 further to the agreement of the Protective Provisions, which are agreed and included in the draft DCO submitted at Deadline 9 [REP9-003] [see response to FG 2.36 in REP7-045].</p> <p>The Statement of Common Ground [REP7-005] with the Environment Agency outlines (Ref 3.1) that the DCO and OEMP have been drafted to require that the Environment Agency be consulted on the relevant aspects of detailed design, construction methods, CEMPs and any subsequent risk assessment and mitigation measures. This consultation process will inform any subsequent regulatory applications.</p>

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		<p>subsequent to the detailed design phase and sufficiently in advance of the relevant works to allow for timely grant of consent.</p> <p>Highways England will continue to engage with the consent granting body ahead of main construction works.</p> <p>A Statement of Common Ground is being developed with the Environment Agency to record the matters that have been agreed between both parties and to identify any matters where comments still need to be resolved.</p>	
4.55	<p>The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts. This will require close cooperation with the Environment Agency and/or the pollution control authority, and other relevant bodies, such as the MMO, Natural England, Drainage Boards, and water and sewerage undertakers, to ensure that in the case of potentially polluting developments:</p>	<p>As described in NPSNN Paragraph 4.54 of this Appendix, close cooperation with the Environment Agency on pollution control requirements is ongoing, and will ensure that potential releases will be adequately regulated, either under the relevant pollution control frameworks or, subject to the Environment Agency’s agreement, will be disapplied and the pollution control requirements will be addressed within the Development Consent Order.</p> <p>Chapter 11 Road Drainage and the Water Environment of the Environmental Statement (Application Document 6.1) indicates that there has been regular and extensive liaison with the Environment Agency and with Wiltshire Council’s</p>	<p>Statements of Common Ground between Highways England and the Environment Agency [REP7-005], Natural England [REP7-011] and Wiltshire Council [REP7-16] show that there are no matters not agreed or under discussion relating to pollution control, contaminated land and public protection, further to the agreed wording within the OEMP and the provisions of Requirement 10 of the DCO.</p>

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	<ul style="list-style-type: none"> the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework; and the effects of existing sources of pollution in and around the project are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits 	<p>Principal Drainage Engineer to discuss the available baseline data, to develop the modelling and impact assessment methodologies and the assessments' initial outcomes for water quality, road drainage and groundwater. This liaison took place within every month from July 2017 to September 2018 and involved meetings, teleconferences and email correspondence on single or multiple water and drainage topics.</p> <p>Engagement with Wessex Water was also undertaken to discuss available baseline data, impact assessment methodologies and the assessments' initial outcomes.</p> <p>Earlier consultation with the Environment Agency and Wiltshire Council is also described within Chapter 10 Geology and Soils of the Environmental Statement (Application Document 6.1), this included identification of existing sources of pollution which could result in cumulative effects. This includes an existing Esso Pipeline in the vicinity of the Scheme, where at the EIA Scoping stage, the Environment Agency identified that the method of works for the construction of the road, bridge and tunnel will need to identify actions that will be taken in the event of intercepting contamination. Chapter 10 identifies</p>	

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		<p>mitigation to address this risk.</p> <p>Further potential existing sources of contamination are identified within Table 10.9, Chapter 10 Geology and Soils of the Environmental Statement (Application Document 6.1). The extent to which these pose a risk to controlled waters, or human health is summarised within Section 10.9. All of the risks identified will be managed, and would therefore not make the development unacceptable, or exceed statutory environmental limits.</p>	
4.56	<p>The Secretary of State should not refuse consent on the basis of regulated impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted.</p>	<p>Details of other regulatory consents to be sought for the Scheme are set out in the Consents and Agreements Position Statement (Application Document 3.3).</p> <p>That document sets out that there is no reason to consider that the relevant permits or licences will not be subsequently granted.</p>	<p>An updated Consents and Agreements Position Statement was submitted at Deadline 6 [REP6-007]. Highways England is not aware of any good reason to believe that such permits would not be granted in due course.</p>
Safety			
4.61	<p>The applicant should undertake an objective assessment of the impact of the proposed</p>	<p>Chapter 6 of the DAS (Application Document 7.2) details how safety of road users has been considered as part of developing the preferred route</p>	<p>Impacts on safety which have arisen as a result of non material changes proposed to the DCO application can be summarised as follows:</p>

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	<p>development on safety including the impact of any mitigation measures. This should use the methodology outlined in the guidance from DfT (WebTAG) and from the Highways Agency.</p>	<p>option and design of the Scheme, including mitigation measures which are proposed, in accordance with this paragraph. Safety benefits include:</p> <ul style="list-style-type: none"> - Provision of a high standard dual carriageway between Amesbury and Berwick Down, this would be constructed to current standards providing a much safer route than existing which is more resilient to incidents; - Provision of grade separated junctions with the A360 and A345, this would allow strategic traffic to continue on the A303 without stopping; - Rat running on local roads would be reduced as local traffic would be able to cross the route via grade separated junctions without the need to travel on the A303, reducing the risk of accident; - Provision of safety standards within the tunnel to meet the requirements of relevant design codes (DMRB and EU Directive 2004/54/EC), this would include: <ul style="list-style-type: none"> o Escape routes between tunnel portals at regular intervals; o An emergency walkway; 	<ul style="list-style-type: none"> i. For NMC-01 to 03 inclusive, there is no physical change to the scheme and thus no impact on safety compared with the draft DCO. ii. NMC-04 provides a new turning head on the old Stonehenge Road, improving safety by providing a defined area for turning vehicles. iii. NMC-05 provides a revised access to land next to the existing A360 north of Longbarrow to address the safety concerns of the landowner who would use the access. iv. NMC-06 downgrades the proposed restricted byway to a cycle track to Stonehenge Visitor Centre, removing access for equestrians and carriages. Revised access arrangement for equestrians and carriages will be developed at detailed design in consultation with Wiltshire Council. v. NMC-07 provides a private means of access to replace an existing access from a byway being stopped up. The layout will be a standard field access, providing safe access to and from the proposed Allington Track link. vi. NMC-08 provides an extension to a proposed private means of access off the new restricted byway south of Green Bridge No.4 to secure access to the DCO boundary. <p>The detailed design for all these proposed changes will be subject to Road Safety Audits following detailed</p>

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		<ul style="list-style-type: none"> ○ Emergency call points at regular intervals ○ Fixed fire-fighting system ○ Vehicle cross-overs on the tunnel approaches to enable contraflow working when one tunnel bore is closed; and ○ Technological management systems to monitor and manage traffic flows, detecting incidents as required. - Provision of safety restraint systems (barriers) in accordance with the required standards along the length of the new dual carriageway; - Provision of green bridges along the route to facilitate safe access across the new A303 route; - Provision of signal controlled surface level crossings at the new Longbarrow junction to facilitate safe NMU access through the junction; - Provision of signal controlled surface level crossings at the upgraded Countess junction to facilitate safe pedestrian and cycle access through the junction; - Alterations to the east of Countess junction have been proposed to improve safety along 	<p>design, construction and initial operation.</p>

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		<p>the A303, these include the following:</p> <ul style="list-style-type: none"> ○ Closing the existing entry from Amesbury Road onto the A303, instead traffic would be accommodated at the Double Hedges junction; ○ Alterations to the entry slip road at the Double Hedges junction; and <p>Access onto PROW's from the A303 between Amesbury Road and the A3028 would be closed.</p> <p>Appendix 2.2 Outline Environmental Management Plan of the Environmental Statement Appendices (Application Document 6.3) also specifies measures to ensure the safety of workers during the construction phase.</p> <p>The Transport Assessment (Application Document 7.4) provides an analysis of accidents and concludes overall that the Scheme would have a beneficial impact in terms of reducing accidents. A Cost and Benefit to Accidents – Light Touch (COBA-LT) assessment has been undertaken in accordance with the Department for Transport's WebTAG guidance. The results are reported within the Transport Assessment (Application Document</p>	

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		<p>7.4), and are summarised below.</p> <p>Over the 60 year appraisal period, without the Scheme, 49,452 accidents and casualties are expected, and with the Scheme 49,400 are expected. This is a decline of 52. This analysis considers all assessed transportation links, and not just the A303 corridor. The decline includes the net effects of rerouting of traffic from other transport corridors, such as the M4/ M5 corridor. For the Scheme section only (not considering other corridors), the Scheme would result in a decrease from 2,049 to 1,941 (a reduction of 108 fewer casualties) over the 60-year appraisal period. As stated in Chapter 5 of this Case for the Scheme document, the monetary value of the overall change in forecast accidents is a benefit of £4 million.</p>	
4.64	<p>The applicant should be able to demonstrate that their Scheme is consistent with the Highways Agency's Safety Framework for the Strategic Road Network and with the national Strategic Framework for Road Safety. Applicants will wish to show that they have taken all steps that are reasonably required to:</p>	<p>Measures to minimise the risk of death and injury during construction are specified within the Appendix 2.2 Outline Environmental Management Plan of the Environmental Statement Appendices (Application Document 6.3).</p> <p>The measures which have been specified, and contribute to a reduction on road casualties, are as per NPSNN paragraph 4.61 of this Appendix.</p> <p>Chapter 4 of the Transport Assessment (Application</p>	<p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013].</p> <p>Safety is included in the overall aims of the Scheme Vision as quoted in the OEMP at paragraph 4.2.6(e). This is reflected in design principle P-G02: <i>"The Scheme will provide a high performing dual carriageway to improve safety on the A303 between Amesbury and Berwick Down by giving due consideration to Highways England's</i></p>

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	<ul style="list-style-type: none"> - minimise the risk of death and injury arising from their development; - contribute to an overall reduction in road casualties; - contribute to an overall reduction in the number of unplanned incidents; and contribute to improvements in road safety for walkers and cyclists. 	<p>Document 7.4) describes the potential for unplanned tunnel incidents or maintenance periods. In general, the Scheme would be more resilient to unplanned incidents than the current road as there is more flexibility with a dual carriageway to close a single lane and manage the traffic during unplanned incidents. The tunnel and approaches have been designed so that one or other bore would remain open during all but the most rare of circumstances, acting as a single carriageway open to two way traffic, with cross- overs at approaches in order to direct traffic as appropriate. In the event of the emergency closure of both bores of the tunnel, traffic would be diverted along the high load route, but using the A345 (Countess Road) rather than the A3028 to re- join the A303 at Countess roundabout.</p> <p>The measures which have been specified, and contribute to an improvement in safety for walkers and cyclists are as per NPSNN paragraph 4.61 of this Appendix.</p>	<p><i>Road to Good Design document.</i>"</p> <p>The OEMP also includes a number of specific measures to improve safety during construction including:</p> <ul style="list-style-type: none"> • PW-G4 and MW-G14 Option for construction work outside normal core hours if required for reasons of safety; • PW-G5 and MW-G8 Requirement for method statements to address safety; • MW-G18 Appropriate training to be given to the workforce; • MW-TRA2 Traffic Management Plan to include measures to ensure safety of traffic, the public and construction staff; • MW-TRA6 Traffic management measures to be provided in consultation with Wiltshire Council and the Emergency Services; and • MW-TRA11 Traffic management measures to be monitored for effectiveness. <p>The measures which have been included in the Scheme, and which contribute to an improvement in safety for walkers and cyclists, include:</p> <ul style="list-style-type: none"> • Provision of a network of segregated NMU routes providing traffic-free rights of way for walkers and cyclists from Yarnburry to Winterbourne Stoke, from Winterbourne Stoke to Longbarrow and the WHS, from Longbarrow extending north and south along the A360 and eastward through the

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			<p>WHS to Amesbury;</p> <ul style="list-style-type: none"> • Provision of signal controlled surface level crossings at the new Longbarrow junction to facilitate safe NMU access through the junction (OEMP measure D-LAN5); and • Provision of signal controlled surface level crossings at the upgraded Countess junction to facilitate safe pedestrian and cycle access through the junction.
4.65	<p>They will also wish to demonstrate that:</p> <ul style="list-style-type: none"> - they have considered the safety implications of their project from the outset; and they are putting in place rigorous processes for monitoring and evaluating safety. 	<p>Chapter 6 of the DAS (Application Document 7.2) details how safety of road users has been considered as part of developing the preferred route option and design of the Scheme. The safety design requirements for the Scheme are as per NPSNN paragraph 4.61 of this Appendix.</p> <p>Appendix 2.2 Outline Environmental Management Plan of the Environmental Statement Appendices (Application Document 6.3) also specifies measures to ensure the safety of workers during the construction phase.</p> <p>As per NPSNN paragraph 4.62, the first stage of Road Safety Audit has been undertaken, and this will be progressed at a later stage of design, subject to development consent.</p>	<p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013]. This includes a number of safety specific commitments as summarised in item 4.64 above</p> <p>A rigorous process for monitoring and evaluating safety is provided for by a range of Highways Englands standard procedures including:</p> <ul style="list-style-type: none"> • implementation of the Plan for Monitoring Operations; • Road Safety Audits; <p>The “Plan for Monitoring Operations” is produced during the construction preparation stage of the Project Control Framework (PCF) and refined during construction (Stage 6). It will define: how monitoring will be carried out; the data that will be recorded; who will be responsible for monitoring; and the precise action that will be taken should monitoring identify a problem.</p>

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			<p>Future stages of Road Safety audit that will be carried out if development consent is granted are:</p> <ul style="list-style-type: none"> • Stage 2 – on completion of detailed design • Stage 3 – On completion of the works and before opening to traffic. Interim Stage 3 audits will be undertaken as the scheme is opened in sections • Stage 4 – approximately 12 months after opening depending on the availability of validated incident and, operational data
4.66	<p>The Secretary of State should not grant development consent unless satisfied that all reasonable steps have been taken and will be taken to:</p> <ul style="list-style-type: none"> - minimise the risk of road casualties arising from the Scheme; and - contribute to an overall improvement in the safety of the Strategic Road Network. 	<p>As described within Chapter 5 of the DAS (Application Document 7.2), the Scheme has been designed to comply with the Design Manual for Roads and Bridges (DMRB). DMRB is the standard which sets desirable minimum criteria for the Scheme geometry - for example horizontal and vertical radii, forward visibility and junction layouts. The DMRB forms the basis of a safe highway design which would minimise the risk of road casualties arising from the Scheme and contribute to an overall improvement in the safety of the SRN. The extent to which these standards have been applied is considered in Appendix 3.1 Departures from Standards Checklist of the Transport Assessment (Application Document 7.4).</p>	<p>The design on which the development consent application is based incorporates some departures from the DMRB standards. This is acknowledged in section 3.6 of the Transport Assessment [APP-297] which also explains the need for such departures: “The need for departures from standard arises from constraints, such as the need to protect the environment. In certain circumstances it can be advantageous to depart from a standard depending on site features, environment, innovation of design, construction methods, materials or developments in associated standards.”</p> <p>Departures are a value-adding mechanism for Highways England to realise benefits from innovation and value engineering, supported by robust safety and economic cases. They are also necessary where the constraints of the project do not permit a design to standards. Highways England operates a Departures Approval System (DAS) to ensure that all departures are fully</p>

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		<p>The Scheme would result in a reduction in road casualties - for the Scheme section only (not considering other corridors), the Scheme would result in a decrease from 2,049 to 1,941 (a reduction of 108 fewer casualties) over the 60-year appraisal period. The effectiveness of steps taken to minimise risk road casualties are as per NPSNN paragraph 4.60 of this Appendix.</p> <p>The Scheme has also been designed to improve safety for NMUs (see NPSNN paragraphs 3.15 and 3.19 of this Appendix.).</p>	<p>documented and that each departure is fully justified i.e. that the benefits outweigh any potential risks and that safety standards are not compromised.</p> <p>Each of the departures incorporated in the preliminary design were considered by the Road Safety Auditor when conducting the Stage 1 Road Safety Audit. Without exception, each recommendation made by the auditor has either been addressed or will be addressed during the detailed design.</p>
Security considerations			
4.76 - 4.77	<p>Where national security implications have been identified, the applicant should consult with relevant security experts from CPNI [Centre for the Protection of National Infrastructure] and the Department for Transport, to ensure that physical, procedural and personnel security measures have been adequately considered in the design process and that adequate consideration has been</p>	<p>Security implications have been carefully considered and no national security issues have been identified in developing the Scheme. As a result, it has not been necessary to consult the CPNI.</p> <p>Appendix 4.2 Major Accidents and Disasters Long List of the Environment Statement Appendices (Application Document 6.3) summarises the potential effects for major accidents and disasters, including natural hazards or terrorist attack. No significant effects are anticipated.</p> <p>The Ministry of Defence has been consulted, and</p>	<p>Further engagement with the Ministry of Defence (MoD) led to a request from the MoD for further specific wording to be included within the OEMP in respect of Boscombe Down, additional to that which was within the original application version of the OEMP.</p> <p>Updates were therefore made to items MW-G31 and MW-WAT14, and the MoD submitted a representation at Deadline 9 [REP9-040] indicating its acceptance of that wording.</p>

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	<p>given to the management of security risks. If CPNI and the Department for Transport (as appropriate) are satisfied that security issues have been adequately addressed in the project when the application is submitted, they will provide confirmation of this to the Secretary of State, and the Examining Authority should not need to give any further consideration to the details of the security measures during the examination. The applicant should only include such information in the application as is necessary to enable the Examining Authority to examine the development consent issues and make a properly informed recommendation on the application.</p>	<p>has not expressed any specific security requirements for the Scheme. See also responses to NPSNN paragraphs 5.56 and 5.57 of this Appendix.</p>	

Table 3 NPS Chapter 5

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Air quality			
5.6 - 5.9	<p>Where the impacts of the project (both on and off-Scheme) are likely to have significant air quality effects in relation to meeting EIA requirements and / or affect the UKs ability to comply with the Air Quality Directive, the applicant should undertake an assessment of the impacts of the proposed project as part of the environmental statement.</p> <p>The environmental statement should describe:</p> <ul style="list-style-type: none"> - existing air quality levels; - forecasts of air quality at the time of opening, assuming that the Scheme is not built (the future baseline) and taking account of the impact 	<p>The method of baseline assessment is included in Chapter 5 Air Quality of the Environmental Statement (Application Document 6.1). The existing and future baseline has been reported in Chapter 5 Air Quality. The future baseline is referred to within the assessment as the 'do minimum' scenario which takes into account what future air quality would be assuming the Scheme does not go ahead. The future baseline also takes into account likely changes owing to government initiatives to reduce pollutant emissions from motor vehicles and other sources, along with traffic growth and committed developments. Within the future baseline Defra projections of air quality have been considered and a conservative approach to these projections has been adopted. The results of the air quality assessment include construction effects and operational effects, the latter of which includes the impact of road traffic generated by the Scheme.</p> <p>Chapter 5 Air Quality of the Environmental Statement (Application Document 6.1) assesses the impact of the Scheme during construction and operation on air quality.</p>	<p>All matters in relation to air quality are agreed with Wiltshire Council (see Section 3 of Statement of Common Ground submitted at Deadline 9).</p>

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	<p>of the Scheme; and</p> <ul style="list-style-type: none"> - any significant air quality effects, their mitigation and any residual effects, distinguishing between the construction and operation stages and taking account of the impact of road traffic generated by the project. <p>Defra publishes future national projections of air quality based on evidence of future emissions, traffic and vehicle fleet. Projections are updated as the evidence base changes. Applicant's assessment should be consistent with this but may include more detailed modelling to demonstrate local impacts.</p> <p>In addition to information on the likely significant effects of a project in relation to EIA, the Secretary of State must be</p>	<p>The evaluation of the significance of local operational air quality effects is reported in Table 5.14, Section 5.9. The table concludes that there are no predicted annual average concentrations of NO₂ or PM₁₀ above the air quality objective in either the years of construction or first year of operation for the scheme in the air quality study area. Therefore, there are no small, medium or large changes in air quality above the air quality objectives expected and as such no significant air quality effects are predicted.</p> <p>A compliance risk assessment has been undertaken for the air quality study area. This found that there are no links reported by Defra to the European Commission as non-compliant in either the years of construction or the first year of scheme operation within the air quality study area. This indicates there is no Air Quality Directive compliance risk for the Scheme.</p> <p>The air quality effects of the Scheme on European and National designated ecosystem sites are considered in Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1). The ecology assessment has concluded that the predicted changes in air quality and nitrogen deposition are not significant.</p>	

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	provided with a judgement on the risk as to whether the project would affect the UK's ability to comply with the Air Quality Directive.		
5.10	<p>The Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the Scheme. In all cases the Secretary of State must take account of relevant statutory air quality thresholds set out in domestic and European legislation. Where a project is likely to lead to a breach of the air quality thresholds, the applicant should work with the relevant authorities to secure appropriate mitigation measures with a view to ensuring so far as possible that those thresholds are not breached.</p>	<p>The study area for the air quality assessment is defined in Chapter 5 Air Quality of the Environmental Statement (Application Document 6.1). This includes detailed consideration of locations along and around the Scheme route and also the wider area. As concluded in that chapter, the assessment indicates that no sensitive receptors are predicted to experience an exceedance of the relevant air quality objective. The majority of receptors are predicted to experience a negligible change in concentration, and would remain below the relevant air quality objective.</p>	<p>All matters in relation to air quality are agreed with Wiltshire Council (see Section 3 of Statement of Common Ground submitted at Deadline 9).</p>

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5.12	The Secretary of State must give air quality considerations substantial weight where, after taking into account mitigation, a project would lead to a significant air quality impact in relation to EIA and / or where they lead to a deterioration in air quality in a zone/agglomeration.	The significance of air quality effects associated with the Scheme and the compliance of the Scheme with the EU Air Quality Directive is presented in Chapter 5 Air Quality of the Environmental Statement (Application Document 6.1). No significant impacts or deterioration across a zone or agglomeration resulting in a compliance risk are predicted.	All matters in relation to air quality are agreed with Wiltshire Council (see Section 3 of Statement of Common Ground submitted at Deadline 9).
5.14 - 5.15	The Secretary of State should consider whether mitigation measures put forward by the applicant are acceptable. A management plan may help codify mitigation at this stage. The proposed mitigation measures should ensure that the net impact of a project does not delay the point at which a zone will meet compliance timescales. Mitigation measures may affect the project design,	Chapter 5 Air Quality of the Environmental Statement (Application Document 6.1) indicates that no specific mitigation is necessary during the operation of the Scheme. Appendix 2.2 Outline Environmental Management Plan of the Environmental Statement Appendices (Application Document 6.3) documents the environmental mitigation measures to be implemented during construction, why they are required, who is responsible for delivering them and details any ongoing maintenance arrangements.	The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013].

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	<p>layout, construction, operation and/or may comprise measures to improve air quality in pollution hotspots beyond the immediate locality of the Scheme.</p> <p>Measures could include, but are not limited to, changes to the route of the new Scheme, changes to the proximity of vehicles to local receptors in the existing route, physical means including barriers to trap or better disperse emissions, and speed control. The implementation of mitigation measures may require working with partners to support their delivery.</p>		
Carbon emissions			
5.17	Carbon impacts will be considered as part of the appraisal of Scheme options (in the business case), prior to	Assessment of GHG emissions was undertaken as part of the appraisal of route alignment options using the WebTAG Environmental Assessment methodology. Chapter 14 Climate of the Environmental Statement	The carbon assessment in Chapter 14 of the Environmental Statement (ES) [APP-052] presents the impact of the Scheme against the UK meeting its legally binding carbon reduction targets. At the time the

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	<p>the submission of an application for DCO. Where the development is subject to EIA, any Environmental Statement will need to describe an assessment of any likely significant climate factors in accordance with the requirements in the EIA Directive. It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. However, for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets.</p>	<p>(Application Document 6.1) presents an assessment of greenhouse gas emissions arising from the construction and operation of the Scheme. Table 14.16 identifies the national level carbon budgets at different project stages. It is concluded that the GHG impact of the Scheme would not have a material impact on the Government meeting its carbon reduction targets.</p>	<p>carbon assessment presented in Chapter 14 was undertaken, the UK's carbon reduction target was an 80% reduction of carbon emissions by 2050 compared to 1990 levels. To meet this 2050 target, a series of legally binding five-year carbon budgets, currently set though to 2032, have been laid down in Parliament and provide a carbon reduction trajectory that the UK must adhere to allow the 2050 carbon reduction target be met. Each carbon budget provides a forecast for a permissible level of carbon emissions within a five-year period. The carbon budgets allow for an increasing reduction in emissions over time to allow for the implementation of necessary policy change and improved technologies to allow for the 2050 target to be met.</p> <p>Carbon emissions from the Scheme have been tested against the five-year carbon budget period in which they arise to determine if the Scheme will have an impact on the UK meeting the 2050 target. The assessment presented in Chapter 14 concluded that the carbon impact of the Scheme would be within the carbon budget threshold and therefore not have a material impact. The updated assessment set out in the Applicant's response to the Examining Authority's First Written Question CC.1.6 [REP2-028] demonstrates the Scheme's Greenhouse Gas (GHG) impact as a proportion of total UK carbon emissions noted that it equates to 0.023% of the fourth carbon budget and 0.008% of the fifth carbon budget.</p>

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			<p>More recently, the Climate Change Act 2008 (2050 Target Amendment) Order 2019[1] (the 2019 Order) has come into force, which amends the Climate Change Act 2008 by revising the previous 2050 carbon target (an 80% reduction of GHG compared to 1990 levels) to a net zero carbon target by 2050. REP6-025 addresses the impacts of the Scheme considering the revised 2050 carbon target. The revised carbon reduction target set within the Climate Change Act 2008 (2050 Target Amendment) Order 2019[1] (the 2019 Order), amends the Climate Change Act 2008 by revising the previous 2050 carbon target (an 80% reduction of GHG compared to 1990 levels) to a net zero carbon target by 2050. In summary, the Committee on Climate Change, which is responsible for setting the carbon budgets, have acknowledged that to meet the new target a steeper reduction trajectory will be required and have stated that they will be reviewing the carbon budgets in 2020 to account for the new 2050 target. The updated budgets have not yet been released and are not expected to be prior to the close of this Examination. It has therefore not been possible to assess the Scheme against the revised carbon budgets.</p> <p>However, in any event the carbon assessment (which has been undertaken using a conservative, 'worst-case emissions' approach) has considered emissions from the Scheme in two separate phases, emissions during construction and emissions during operation.</p>

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			<p>Construction of the Scheme is a short-term activity that will be complete by 2026. Emissions from construction therefore fall within the nearer term 3rd and 4th carbon budgets. Emissions from the operation of the Scheme will fall into the 4th, 5th and subsequent future budgets once set through to 2050. Whilst a reduction in the carbon budgets may occur in the 2020 review, the Committee on Climate Change has indicated that the trajectory will be steeper therefore it is later carbon budgets rather than near term ones which will see a greater impact.</p> <p>Since the publication of the ES, the UK Government has issued the strategy document 'Road to Zero' (2018), which sets out measures to help achieve carbon reduction in the transport sector e.g. by 2030 between 50% and 70% of new car sales and 40% of new van sales will be ultra-low emission vehicles, and by 2040 all new car and van sales will be zero carbon vehicles, therefore road user emissions will decrease. As the impact of increased electric vehicles and the decarbonisation of grid electricity takes effect the carbon impact associated with road users will decrease and will be significantly lower than the figures in the assessment that is presented in Chapter 14 of the ES. As the national grid is decarbonised and the uptake of electric vehicles increases in line with Government Policy, so the use of electric vehicles in place of combustion engine driven vehicles will contribute to meeting UK carbon reduction targets.</p>

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			[1] 2019 No 1056. The Climate Change Act 2008 (2050 Target Amendment) Order 2019
5.19	Evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout, and use of materials) in both design and construction should be presented. The Secretary of State will consider the effectiveness of such mitigation measures in order to ensure that, in relation to design and construction, the carbon footprint is not unnecessarily high. The Secretary of State's view of the adequacy of the mitigation measures relating to design and construction will be a material factor in the decision making process.	<p>Highways England's license has a requirement for minimising GHG emissions.</p> <p>Section 14.8, Chapter 14 Climate of the Environmental Statement (Application Document 6.1) identifies mitigation measures to be implemented to reduce emissions across the lifecycle of the Scheme. These measures are set out in Table 14.12 and include:</p> <ul style="list-style-type: none"> • Development and implementation of a plan to reduce energy consumption and associated carbon emissions, e.g. consideration of renewable and/or low or zero carbon energy • Where reasonably practicable, the implementation of measures to manage material resource use during construction, such as: <ul style="list-style-type: none"> ○ Use of materials with lower embedded greenhouse gas emissions (and water consumption); ○ Use of sustainably sourced materials; ○ Use of recycled or secondary materials. 	For the position on climate change for road drainage and water, see the response to paragraph 4.38 and refer to OEMP (MW-WAT2, MW-WAT12 and MW-WAT13).
Biodiversity and ecological conservation			
5.22 -	Where the project is subject	Chapter 8 Biodiversity of the Environmental Statement	No changes to the results of the construction and

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5.23	<p>to EIA the applicant should ensure that the environmental statement clearly sets out any likely significant effects on internationally, nationally and locally designated sites of ecological or geological conservation importance (including those outside England) on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity and that the statement considers the full range of potential impacts on ecosystems.</p> <p>The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.</p>	<p>(Application Document 6.1) outlines the effects on sites, habitats and species. The potential impacts on Ecosystems are summarised in Section 8.7, including:</p> <ul style="list-style-type: none"> • Habitat loss or gain; • Fragmentation of populations or habitats; • Disturbance; • Habitat Degradation; • Species Mortality. <p>The significant effects are summarised in Section 8.9, Chapter 8 Biodiversity of the Environmental Statement – the only adverse of such effects being the loss of the designated non-statutory Countess Cutting CWS. The non-significant effects are summarised in Appendix 8.23 of the Environmental Statement Appendices (Application Document 6.3). Appendix 8.23 indicates that after mitigation and enhancement measures are taken into consideration:</p> <ul style="list-style-type: none"> • internationally and nationally designated habitats are not expected to be subject to significant effects. • Locally designated or undesignated habitats are expected to experience neutral or beneficial effects due to habitat creation and enhancement measures. These include Parsonage Down CWS, Luxenborough 	<p>operational assessments as reported in the ES have been made.</p> <p>The Applicant has set out how it considers it has taken advantage of opportunities to conserve and enhance biodiversity in various submissions during the examination, including, in particular, in its response to SWQ DCO.2.67 [REP6-027]. The Applicant has taken every opportunity to build in features beneficial for biodiversity as part of the embedded design of the Scheme and securing these through the requirements of the OEMP and the DCO requirements.</p> <p>All matters are agreed between Highways England and Natural England, please refer to Issue reference 3.5 whereby Natural England state that they are “<i>broadly supportive of the application with regards to its impacts on biodiversity</i>” (see Statement of Common Ground [AS-106]).</p> <p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013]. Compliance with the OEMP is secured through Requirement 4 of the DCO [REP9-003].</p>

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		<p>Banks CWS, and Stonehenge Down CWS which would benefit from improved or enhanced habitat.</p> <ul style="list-style-type: none"> • Undesignated habitat, including calcareous unimproved grassland would be affected by an adverse effect due to the loss of the Countess Cutting, and this loss would be compensated within an adjacent cutting. The grassland within the replacement cutting would be classed as semi-improved. • Individual species (protected or otherwise) are not expected to experience significant adverse effects. Slight beneficial effects are anticipated for bats and badgers. <p>Section 8.8, Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1) also describes the design mitigation and enhancement measures which are proposed. The construction and operational mitigation and enhancement measures include:</p> <ul style="list-style-type: none"> • Four green bridges to establish and improve connectivity of habitat. • The Scheme is in a cutting for most of its length, where necessary these include false cuttings to reduce risk of mortality for bats and birds. • River Till Viaduct has been designed to minimise 	

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		<p>shading impact on sensitive marginal habitat.</p> <ul style="list-style-type: none"> • Replacement and improvement of habitats. • Improved east-west connectivity of habitat through creation of new habitats and soft estate. • Two bat hibernation features. • Lighting only included where necessary to minimise impact on bats. • Enhancement of chalk grassland between Parsonage Down SSSI and the Scheme to the south. <p>In addition, Appendix 2.2 OEMP (Application Document 6.3) proposes further measures to limit effects on biodiversity during construction.</p> <p>Chapter 10 of the Environmental Statement (documents reference 6.1) indicates that there are no geological SSSIs within the Scheme study area. Furthermore, there are no Local Geological Sites (LGS) within the Scheme study area.</p>	
5.25	As a general principle, and subject to the specific policies below, development should avoid significant harm to biodiversity and geological	The Scheme has sought to avoid significant harm to features of biodiversity interest, both during the consideration of alternatives, and during the Environmental Impact Assessment. The approach ensures that where significant adverse effects are	Please see the update to paragraphs 5.22-23 above.

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	<p>conservation interests, including through mitigation and</p> <ul style="list-style-type: none"> consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought. 	<p>anticipated these are compensated where it has not been possible to mitigate or avoid such effects. As stated in Section 8.8, Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1), the Scheme incorporates measures that have been embedded into the design to mitigate adverse effects on biodiversity features and compensate for the loss of habitats by the creation of new areas of habitat within the Scheme. It also includes working practices which to avoid significant harm and provide mitigation for important biodiversity features during construction and operation. These measures have been identified and developed through the EIA process, including consultation with stakeholders and statutory bodies.</p> <p>Chapter 3 Assessment of Alternatives of the Environmental Statement (Application Document 6.1) describes where features of biodiversity conservation interest have been taken into consideration in both the selection and design of the Scheme. No features of geological conservation interest were identified as key constraints which informed the assessment of alternatives.</p> <p>Section 8.10 in Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1) states that during construction the permanent loss would</p>	

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		<p>occur of the Countess Cutting CWS which is designated for approximately 0.74ha of early successional chalk grassland it supports. The loss of the chalk grassland within this site at the year of opening is considered to be a significant adverse effect. However, this loss would be compensated over time by the creation of chalk grassland in the new cutting between the eastern portal and Countess Junction.</p> <p>Habitat loss and gain is summarised within Section 8.9 Chapter 8 Biodiversity of the Environmental Statement. The Scheme would lead to the loss of approximately 16ha of semi-natural habitats, of which less than 1ha has been assessed as being of local value. No irreplaceable habitats would be affected (such as ancient woodland or veteran trees). Overall, there would be a net gain of approximately 186ha of semi-natural habitats in the soft estate and East Parsonage Down, mainly chalk grassland. Over time, this would contribute to enhancing the natural environment locally by providing net gains for biodiversity, and by establishing coherent ecological networks that are more resilient to current and future pressures.</p> <p>Regarding geological conservation interests, as per NPSNN paragraph 5.24 of this Appendix, these are not present.</p>	

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5.26	<p>In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national and local importance, protected species, habitats and other species of principal importance for the conservation of biodiversity, and to biodiversity and geological interests within the wider environment.</p>	<p>The presence of designated sites, protected species, habitats and sites of principal importance within the study area is described in Tables 8.11 and 8.12 of Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1). This table also describes the sensitivity and value which they are attributed within the assessment.</p> <p>A summary of the impact significance after the implementation of mitigation/enhancement measures and adherence to best practice working methods is provided in Section 8.9 of Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1).</p> <p>Section 8.9 in Chapter 8 Biodiversity of the Environmental Statement indicates that the integrity of the River Avon SAC (incorporating the River Till SAC) and the Salisbury Plain SAC and SPA would not be adversely affected by the Scheme.</p> <p>The significant effects on Countess Cutting CWS are as per paragraph 5.25 above. Areas of lowland calcareous unimproved chalk grassland (a Habitat of Principal Importance) are located within Countess Cutting CWS and would result in an adverse residual effect.</p> <p>The loss of the chalk grassland at Countess Cutting CWS would also represent an adverse residual effect on</p>	<p>No changes to the results of the construction and operational assessments as reported in the ES have been made.</p> <p>Ongoing consultation with Natural England, Wiltshire Council and the RSPB has been undertaken throughout the DCO Examination Period. This has led to all matters relating to biodiversity being agreed between Highways England and Natural England, RSPB and Wiltshire Council (see Statements of Common Ground [AS-106, REP7-013 and REP7-015]).</p>

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		<p>terrestrial invertebrates due to habitat loss. This impact would be partially counteracted by the provision of suitable habitat that is to be created for reptiles adjacent to the area to be lost and the new cutting mentioned above and is expected to be suitable for notable terrestrial invertebrates.</p> <p>Regarding geological conservation interests, as per NPSNN paragraph 5.24 of this Appendix, these are not present.</p>	
5.27	<p>The most important sites for biodiversity are those identified through international conventions and European Directives. The Habitats Regulations provide statutory protection for European sites (see also paragraphs 4.22 to 4.25). The National Planning Policy Framework states that the following wildlife sites should have the same protection as European sites:</p> <ul style="list-style-type: none"> - potential Special Protection Areas and possible Special Areas of 	<p>Section 8.10, Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1) indicates that the integrity of the River Avon SAC (incorporating the River Till SAC) and the Salisbury Plain SAC and SPA would not be adversely affected by the Scheme. These findings are provided in detail in Appendix 8.25 Assessment of Implications for European Sites Statement to Inform Appropriate Assessment of the Environmental Statement Appendices (Application Document 6.3).</p> <p>No listed or proposed Ramsar sites or sites, or sites identified or required as compensatory measures for adverse effects on European sites, including potential SPA or SAC, and listed or proposed Ramsar Sites are affected by the Scheme.</p>	<p>No changes to the results of the construction and operational assessments as reported in the ES have been made.</p> <p>The Applicant maintains the Scheme does not result in an adverse effect in the integrity of any European sites. During the examination, there has been engagement on the issue of impacts on stone curlew. The Applicant is proposing to secure by DCO requirement the provision and maintenance of one replacement stone curlew plot (due to the loss of a plot during construction) and three additional plots (as a package of mitigation and enhancement measures) to provide certainty beyond 'reasonable scientific doubt' that there would be no adverse effect on the integrity of the Salisbury Plain SPA. Further information has been provided by the Applicant on this in submissions, the latest of which is the response to the ExA's Rule 17 request for further information dated 3 September, submitted at Deadline 9 [REP9-031].</p>

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	<p>Conservation;</p> <ul style="list-style-type: none"> - listed or proposed Ramsar sites; and - sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation and listed or proposed Ramsar sites. 		<p>All matters associated with biodiversity are agreed between Highways England and Natural England, Wiltshire Council, RSPB and the Environment Agency (see Statements of Common Ground [AS-106, REP7-011, REP7-013 and REP7-015].</p> <p>The clarification note submitted as Appendix 1 of Appendix A to the Statement of Common Ground with Natural England [AS-106] provides further clarification and signposting in respect of HRA matters. The Examining Authority's Report on the Implications for European Sites was published in September 2019 [PD-019] and the Applicant has submitted a response to this at Deadline 9 [REP9-031].</p>
Biodiversity SSSIs			
5.29	<p>Where a proposed development on land within or outside a SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect on the site's</p>	<p>As described within Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1), the Scheme avoids the SPA, NNR and RSPB reserve and there would be no direct habitat loss from the SACs and SSSIs. The mitigation measures proposed as part of the Scheme are considered acceptable to mitigate harm and therefore, the Scheme is not likely to have an adverse indirect effect on a SSSI, either individually or in combination with other developments. The mitigation which is proposed to address potential adverse effects</p>	<p>No changes to the results of the construction and operational assessments as reported in the ES have been made.</p> <p>All matters associated with biodiversity are agreed between Highways England and Natural England, Wiltshire Council, RSPB and the Environment Agency (see Statements of Common Ground [AS-106, REP7-011, REP7-013, and REP7-015]).</p> <p>The OEMP has been updated during the Examination and the final draft submitted at Deadline 9 [REP9-013] (together with a mark up showing changes since</p>

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	<p>notified special interest features is likely, an exception should be made only where the benefits of the development at this site clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs.</p> <p>The Secretary of State should ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest, are acceptable.</p> <ul style="list-style-type: none"> Where necessary, requirements and/or planning obligations 	<p>as described in Chapter 8 Biodiversity is described in further detail below. Section 8.3, Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1) outlines the assessment approach for this topic chapter. Table 8.9 describes the SSSIs and NNR which are within the study area.</p> <ul style="list-style-type: none"> Salisbury Plain SSSI: Located adjacent to the Scheme boundary in two locations near Bulford camp to the far east of the Scheme and Rollestone Junction to the north of the Scheme; River Avon System SSSI: Crossed by the Scheme; River Till SSSI: Crossed by the Scheme; Parsonage Down SSSI and NNR: The SSSI section is located adjacent to the Scheme boundary. The NNR is partially located within Scheme boundary; Yarnbury Castle SSSI: Located approximately 80m from the Scheme boundary; Steeple Langford Down SSSI: Located approximately 840m from the proposed boundary. <p>Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1) considers the effects of the proposed viaduct over the River Till, which has the potential for indirect impacts on the SAC / SSSI, due to the permanent shading associated with the River Till</p>	<p>application [REP9-030]), the avoidance and mitigation measures incorporated into the updated OEMP are considered suitable, achievable and proportionate. These include measure D-BIO1 (which incorporates embedded design features for the River Till viaduct to minimise shading).</p>

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	<p>should be used to ensure these proposals are delivered.</p>	<p>viaduct. To minimise shading of vegetation under the viaduct, the design is a twin-deck structure, with a gap of a minimum of 7m between the decks. Continuity of vegetation within the SSSI would be maintained and hence it would not result in an impact on the integrity of the SAC. As such the impacts of shading are considered to result in a neutral effect.</p> <p>Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1) considers the effects of the proposed temporary bridge over the River Till SSSI during the construction phase (approximately two years). The temporary bridge would be a single lane bridge approximately 6m wide, to reduce the temporary shading impact on the habitat below. It is concluded that the temporary bridge, while it would cause localised shading, would not be present for long enough to cause an irreversible adverse effect on the integrity of the habitats present within the SAC and SSSI, and would have neutral effect on the integrity of the biodiversity features of the SAC.</p> <p>As described in Section 8.9, Chapter 8 Biodiversity of the Environmental Statement there would be no loss of habitat within Parsonage Down SSSI for the construction of the scheme, there would be modification of existing calcareous grassland in 1.2ha of the 188ha</p>	

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		<p>Parsonage Down SSSI to provide a stone curlew nesting plot. The potential impacts of construction would therefore be:</p> <ul style="list-style-type: none"> • habitat modification; and • habitat degradation due to possible pollution events and dust deposition. <p>The mitigation which is proposed to limit dust generation is based on Institute of Air Quality Management guidance, and is outlined in Section 8.9 Chapter 8 Biodiversity of the Environmental Statement. Overall the impact on Parsonage Down SSSI from the habitat modification due to creation of the stone curlew nesting plot is considered to result in a benefit the SSSI.</p> <p>As described in Section 8.9, Chapter 8 Biodiversity of the Environmental Statement, the potential operational impacts on Parsonage Down SSSI / NNR would be limited to habitat degradation from NOx deposition. The mitigation which is proposed to mitigate NOx deposition is outlined in Chapter 8 Biodiversity of the Environmental Statement, and includes conversion of existing areas of agricultural land to chalk grassland.</p> <p>Removing these areas from nitrogen fertilisation, which would otherwise run off into the SSSI, would contribute to offsetting the potential atmospheric nitrogen</p>	

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		<p>deposition resulting from NOx deposition. Following implementation of this mitigation, no significant operational effects are expected on the structure and function of the SSSI / NNR as the SSSI / NNR is fully and partially located within the SAC (respectively).</p> <p>As described in Section 8.2, Chapter 8 Biodiversity, the measures that will be deployed on this Scheme are incorporated within Appendix 2.2 Outline Environmental Management Plan (document reference 6.3) which is submitted as part of the DCO application and will be finalised at the end of the DCO Examination period. The requirements within the OEMP will be secured within the DCO. The measures in the OEMP will then be applied in practice by the appointed contractors.</p> <p>Regarding geological conservation interests, as per NPSNN Paragraph 5.24 of this Appendix, these are not present.</p>	
Biodiversity -Irreplaceable habitats including ancient woodland and veteran trees			
5.33	Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features as part of	Section 8.8, Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1) describes the mitigation and enhancements which are proposed. These measures maximise the opportunity for the Scheme to benefit biodiversity by improving existing habitat, and in particular connectivity between habitats	The Applicant has set out how it considers it has taken advantage of opportunities to conserve and enhance biodiversity in various submissions during the examination, including, in particular, in its response to SWQ DCO.2.67 [REP6-027]. The Applicant has taken every opportunity to build in features beneficial for biodiversity as part of the design of the Scheme and

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	<p>good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that</p> <ul style="list-style-type: none"> such beneficial features are delivered. 	<p>in an east west direction, reconnecting existing semi natural habitats within the wider landscape. See also further detail in the response to NPSNN paragraph 5.22-5.23. For example, the creation of chalk grassland that is proposed between Parsonage Down SSSI and the Scheme to the south would benefit existing species including invertebrates, such as butterflies through improved habitats.</p>	<p>securing these through the requirements of the OEMP and the DCO requirements (see, for example, item MW-BIO2 of the OEMP, which requires the new habitats shown on the Environmental Masterplan [APP-059] to be established, and the reference in Requirement 8 that the landscaping scheme to be approved by the Secretary of State must be based on the mitigation measures in the ES. These measures include the OLEMP [APP-267] which deals with the establishment of the proposed chalk grassland.</p> <p>All matters are agreed between Highways England and Natural England, in particular Natural England "<i>is broadly supportive of the application with regards to its impacts on biodiversity. It seems reasonable to conclude that the scheme will deliver net gain for biodiversity</i>" (see Statement of Common Ground [AS-106]). Furthermore, as stated within the Statement of Common Ground with RSPB, that the landscaping has been designed to achieve Lawton's principles of landscape scale conservation, more, bigger and better connected [REP7-10].</p> <p>All matters associated with biodiversity are agreed between Wiltshire Council, and the Environment Agency (see Statements of Common Ground [REP7-005 and REP7-015]).</p>
Biodiversity - Protection of other habitats and species			

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5.35	<p>Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection. The Secretary of State should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits of the development (including need) clearly outweigh that harm.</p>	<p>Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1) considers all ecological features, identifies those that are of principal importance and assesses the residual effect. Ecology and nature conservation has been assessed in accordance with relevant sections of the DMRB (as updated by Interim Advice Note 130/10). Information was obtained from previous studies, biological records, consultation with relevant organizations, and field surveys completed in 2018.</p> <p>The mitigation and enhancement measures that will be deployed on this Scheme are being incorporated into Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3). This details the environmental mitigation measures that would be implemented during construction, why they are required, who is responsible for delivering them and detailing any ongoing reporting criteria.</p> <p>Of the six Habitats of Principal Importance within the 500m study area considered in Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1), only good quality semi-improved grassland, lowland calcareous grassland, deciduous woodland and lowland fens occur within the Scheme boundary. Habitat loss and gains associated with the Scheme are</p>	<p>No changes to the results of the construction and operational assessments as reported in the ES have been made.</p> <p>Following ongoing engagement with interested parties, the OEMP has been updated during the Examination and the final draft submitted at Deadline 9 [REP9-013] (together with a mark up showing changes since application [REP-030]). The OEMP has been updated to include further avoidance and mitigation measures for protected species, such as stone curlew and great bustard, and these measures are considered sufficient to avoid any significant impacts on these species (as stated, for example, within PW-BIO5 and MW-BIO8).</p> <p>All matters associated with biodiversity are agreed between Highways England and Natural England, Wiltshire Council, RSPB and the Environment Agency (see Statements of Common Ground [AS-106, REP7-011, REP7-013, and REP7-015]).</p>

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		<p>summarised in Table 8.14, and include Habitats of Principal Importance (HPI). Overall the Scheme would lead to the loss of approximately 16ha of semi-natural habitats. As shown on Figure 2.5 Environmental Masterplan of the Environmental Statement (Application Document 6.2), there would be approximately 203ha of new habitats, mainly chalk grassland (162ha), which would be present and</p> <p>developing at year of opening (2026) and these would be more established by the assessment 15 years after opening. The benefits in terms of habitat creation therefore significantly outweigh the losses to HPI. In addition to the biodiversity benefits, the losses of HPI would also be outweighed by the economic, transport and heritage benefits of the Scheme. These benefits include creating a high quality, reliable route alleviating local issues associated with congestion, and improving connectivity between the South East and South West, and reconnecting the historic landscape and in doing so protecting and enhancing the OUV of the WHS.</p> <p>Once mitigation is taken into account, there are no significant long-term adverse effects persisting into the operational period. Some construction effects are significant at a local level only, but are short-term.</p>	

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Biodiversity – Mitigation			
5.36	<p>Applicants should include appropriate mitigation measures as an integral part of their proposed development, including identifying where and how that:</p> <ul style="list-style-type: none"> - during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works; - during construction and operation, best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised (including as a consequence of transport access arrangements); 	<p>Measures to reduce the potential construction effects on biodiversity are specified within Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3), and include:</p> <ul style="list-style-type: none"> - measures which are required to limit the impacts outside the Scheme boundary, including through provision of site hoarding and fencing; - measures to reduce the potential for disturbance or effects on species and habitats, including great crested newts, reptiles, birds, bats, badgers, otters, water vole and other species; - measures required to enable restoration of habitats following construction; - new green infrastructure, which provides an ecological benefit, as per NPSNN paragraph 5.22-5.23 of this Appendix, including the need to minimise habitat fragmentation; - enhancement of existing habitats, as per NPSNN paragraph 5.22-5.23 of this Appendix. These improvements include greening of existing network crossing points through the provision of three green 	<p>Following ongoing engagement with interested parties during the examination, the OEMP has been updated and the final draft submitted at Deadline 9 [REP9-013] (together with a mark up showing changes since application [REP9-030]). The OEMP has been updated to include further avoidance and mitigation measures in relation to biodiversity, such as measures relating to stone curlew and great bustard. The measures contained in the OEMP are considered sufficient and appropriate mitigation measures. Compliance with the OEMP is secured by way of Requirement 4. The DCO also contains measures in relation to protected species at Requirement 6.</p> <p>All matters associated with biodiversity are agreed between Highways England and Natural England, Wiltshire Council, RSPB and the Environment Agency (see Statements of Common Ground [AS-106, REP7-011, REP7-013, and REP7-015]).</p> <p>Please see updates above in respect of the Applicant's approach to enhancement.</p>

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	<ul style="list-style-type: none"> - habitats will, where practicable, be restored after construction works have finished; - developments will be designed and landscaped to provide green corridors and minimise habitat fragmentation where reasonable; - opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals, for example through techniques such as the 'greening' of existing network crossing points, the use of green bridges and the habitat improvement of the network verge. 	<p>bridges, and habitat improvement within the network verge.</p> <p>The location and specifications for habitat restoration and new habitat creation are set out in Appendix 8.26 Outline Landscape and Ecological Management Plan of the Environmental Statement Appendices (Application Document 6.3).</p>	
5.37	The Secretary of State should consider what appropriate	The draft DCO (Application Document 3.1) Schedule 2, Part 1 includes a requirement that the applicant must	Compliance with the OEMP remains secured by way of Requirement 4 and a final version of the OEMP has been

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	<p>requirements should be attached to any consent and/or in any planning obligations entered into in order to ensure that mitigation measures are delivered.</p>	<p>comply with the OEMP, which would be certified as part of the making of the DCO. The mitigation which is specified in the OEMP is secured by this section of the DCO.</p> <p>Further detailed requirements are described within the draft DCO, and relate to mitigation and management of environmental effects. These include, but are not limited to, requirements relating to protected species, contaminated land and groundwater, implementation of landscaping, archaeology, traffic management and surface water drainage.</p>	<p>submitted at Deadline 9 [REP9-013] (together with a mark up showing changes since application [REP9-030]). However, the Construction Environmental Management Plans, and subsidiary plans (including the Landscape and Ecology Management Plan) are now required to be submitted to the Secretary of State for approval.</p> <p>In addition to the DCO requirements originally proposed (some of which have been the subject of revision during the examination to take into account comments received), the Applicant is proposing to secure by DCO requirement the provision and maintenance of one replacement stone curlew plot (due to the loss of a plot during construction) and three additional plots (as a package of mitigation and enhancement measures) to provide certainty beyond 'reasonable scientific doubt' that there would be no adverse effect on the integrity of the Salisbury Plain SPA. Further information has been provided by the Applicant on this in submissions, the latest of which is the response to the ExA's Rule 17 request for further information dated 3 September, submitted at Deadline 9 [REP9-031].</p>
Waste Management			

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5.42	<p>The applicant should set out the arrangements that are proposed for managing any waste produced. The arrangements described should include information on the proposed waste recovery and disposal system for all waste generated by the development. The applicant should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that the alternative is the best overall environmental outcome.</p>	<p>Chapter 12 Materials of the Environmental Statement (Application Document 6.1) discusses the arrangements proposed for managing waste produced by the Scheme. Material use and waste generation is expected to be very small during operation of the Scheme.</p> <p>Section 12.7, Chapter 12 Materials of the Environmental Statement (Application Document 6.1) explains that as part of the OEMP, construction contractors will be required to produce a Site Waste Management Plan which will identify and record the types, quantities and destination of waste arisings from the Scheme and define measures to minimise waste arisings from the Scheme and to recover waste materials</p> <p>in accordance with the principles of the waste hierarchy. The OEMP also identifies approaches which will be followed to minimise waste generation and disposal including recovery targets and monitoring.</p> <p>As described in Chapter 12 Materials of the Environmental Statement (Application Document 6.1), it is anticipated there will be an overall cut-fill balance of excavated material for the Scheme. This will be achieved through reuse of materials on site to backfill excavations or adjust local site levels.</p> <p>Appendix 12.1 The Tunnel Arisings Management</p>	<p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013].</p> <p>The Applicant responded to queries raised with regard to the Tunnel Arisings Management Strategy (Appendix 12.1 of the Environmental Statement) [APP-285] (TAMS) by the ExA and the NFU in its response to FWQs Ag 1.1 and 1.27 [REP2-022], and the WM series of Examining Authority's first written questions [REP-037] and in its comments on the NFU's Written Representation [REP3-013] and in its responses to the WM series in the Examining Authority's second written questions [REP6-033].</p>

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		<p>Strategy of the Environmental Statement Appendices (Application Document 6.3) sets out the proposed strategy for managing material excavated from the tunnelling works which are the largest volume of material produced during construction. Excavated material is proposed to be re-used within the boundary of the Scheme, to the east of Parsonage Down NNR. Excavated material will be managed in accordance with a Materials Management Plan produced under the CL:AIRE Code of Practice (Ref 12.21) and therefore the excavated material is not considered as a waste. The on-site management of excavated material will therefore not require the use of any existing waste management capacity in the region and is the most suitable approach compared with off-site alternatives.</p>	
5.43	<p>The Secretary of State should consider the extent to which the applicant has proposed an effective process that will be followed to ensure effective management of hazardous and non-hazardous waste arising from the construction and operation of the proposed development. The Secretary of State should be satisfied that the process sets out:</p>	<p>Section 12.1, Chapter 12 Materials of the Environmental Statement (Application Document 6.1) indicates the Scheme would prioritise waste prevention, followed by preparing for re-use, recycling, recovery and lastly disposal to landfill as per the internationally recognised waste hierarchy.</p> <p>Section 12.9 describes the targets which are proposed for materials management including a 22% target for use of secondary and recycled aggregates, for those applications where it is technically and economically feasible to substitute these alternative materials for primary aggregates. In addition, Appendix 2.2 OEMP of</p>	<p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013].</p> <p>The 22% target for use of secondary and recycled aggregates is set by Highways England; it is not a statutory requirement.</p>

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	<ul style="list-style-type: none"> - any such waste will be properly managed, both on- site and off-site; - the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area; and - adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent to disposal, except where an alternative - is the most sustainable outcome overall. 	<p>the Environmental Statement Appendices (Application Document 6.3) secures a target for an overall recovery rate for construction waste materials of 70%. A SWMP will be developed by the contractor pursuant to the OEMP.</p> <p>Information on the capacity of the waste market has been identified in Chapter 12 Materials of the Environmental Statement (Application Document 6.1).</p>	

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Civil and military aviation and defence interests			
5.56	<p>The applicant should consult the MoD, CAA, National Air Traffic Services (NATS) and any aerodrome – licensed or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation or other defence interests.</p>	<p>Highways England has met with the MoD to ensure the scope and sensitivities of their operations are fully understood and protected accordingly and agree the approach adopted. Full details of how representations received from the MoD have been addressed can be found in the Consultation Report (Application Document 5.1).</p> <p>As part of the EIA Scoping consultation NATS (En Route) Public Limited Company ("NERL") confirmed that the Scheme presented for EIA Scoping does not conflict with their safeguarding criteria and therefore they had no safeguarding objection to the Scheme.</p> <p>The Civil Aviation Authority were consulted, but indicated that they had no comments on the Scheme.</p> <p>No further elements of Communication, Navigation and Surveillance (CNS) infrastructure are affected by the Scheme.</p>	<p>Further engagement with the Ministry of Defence (MoD) led to a request from the MoD for further specific wording to be included within the OEMP in respect of Boscombe Down, additional to that which was within the original application version of the OEMP.</p> <p>Updates were therefore made to items MW-G31 and MW-WAT14, and the MoD submitted a representation at Deadline 9 [REP9-040] indicating its acceptance of that wording.</p>
5.57	<p>Any assessment on aviation or other defence interests should include potential impacts during construction and operation of the project upon the operation of CNS</p>	<p>As per NPSNN Paragraphs 5.55 and 5.56 of this Appendix, no assessment of operational effects of aviation or other defence interests is required at this stage. Further consultation with the MOD regarding construction effects on their operations (including</p>	<p>See response to paragraph 5.56.</p>

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	infrastructure, flight patterns (both civil and military), other defence assets and aerodrome operational procedures.	infrastructure and flight patterns) will be undertaken prior to construction as specified in Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3).	
5.58	If any relevant changes are made to proposals for an NSIP during the pre-application period or before the end of the examination of an application, it is the responsibility of the applicant to ensure that the relevant aviation and defence consultees are informed as soon as reasonably possible.	No such changes are anticipated, however in such an event the relevant consultees would be informed.	Whilst non-material changes were made to the Scheme, none of them were relevant to the operations at Boscombe Down airfield.
5.59	The Secretary of State should be satisfied that effects on civil and military aviation and other defence assets have been addressed by the applicant and that any necessary assessment of the proposal on aviation or	No effects on civil or military aviation and other defence assets are anticipated. The approach to consideration of these issues is as per NPSNN Paragraphs 5.55, 5.56 and 5.57 of this Appendix.	See response to paragraph 5.56.

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	<p>defence interests has been carried out. In particular, it should be satisfied that the proposal has been designed to minimise adverse impacts on the operation and safety of aerodromes and that reasonable mitigation is carried out. It may also be appropriate to expect operators of the aerodrome to consider making reasonable changes to operational procedures. The Secretary of State will have regard to the necessity, acceptability and reasonableness of operational changes to aerodromes, and the risks or harm of such changes when taking decisions. When making such a judgement in the case of military</p> <p>aerodromes, the Secretary of State should have regard to</p>		

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	interests of defence and national security.		
5.62	<p>Where, after reasonable mitigation, operational changes and planning obligations and requirements have been proposed, development consent should not be granted if the Secretary of State considers that:</p> <ul style="list-style-type: none"> - a development would prevent a licensed aerodrome from maintaining its licence; - the benefits of the proposed development are outweighed by the harm to aerodromes serving business, training or emergency service needs; or - the development would significantly impede or 	<p>Given that the Scheme is not expected to affect civil and military aviation interests, no mitigation is proposed at this stage.</p>	<p>See response to paragraph 5.56.</p>

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	<p>compromise the safe and effective use of defence assets or significantly limit military training.</p>		
Dust, odour, artificial light, smoke, steam			
5.82	<p>Because of the potential effects of these emissions and in view of the availability of the defence of statutory authority against nuisance claims s.104 of the Planning Act 2008 described previously, it is important that the potential for these impacts is considered by the applicant in their application, by the Examining Authority in examining applications and by the Secretary of State in taking decisions on development consents.</p>	<p>The Statement of Statutory Nuisances (Application Document 6.5) explains how the Scheme would not cause a nuisance for reasons of dust, odour, artificial light, smoke and steam, having regard to the results of the Environmental Statement (Application Document 6.1).</p> <p>Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3) details the mitigation measures that would be implemented during the construction of the Scheme which would seek to keep impacts to the local community to a minimum. The Appendix 2.2 OEMP (Application Document 6.3) is secured within the Requirements in Schedule 2 of the draft DCO (Application Document 3.1).</p>	<p>The final draft of the OEMP issued at Deadline 9 [REP9-013] continues to secure measures to minimise the detrimental impact of lighting, both during construction (PW-G6 and MW-G28 and 29) and design (D-CH9, 10,11,12 andP-PROW3).</p> <p>The final draft of the OEMP also secures various measures for the control and minimisation of dust, air pollution and exhaust emissions (PW-AIR1 and MW-AIR1 to 5).</p>
5.83	<p>For nationally significant infrastructure projects of the</p>	<p>The methods to keep impacts to a minimum are described in Appendix 2.2 OEMP of the Environmental</p>	<p>The final draft of the OEMP issued at Deadline 9 [REP9-013] continues to secure measures to minimise the</p>

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	<p>type covered by this NPS, some impact on amenity for local communities is likely to be unavoidable.</p> <p>Impacts should be kept to a minimum and should be at a level that is acceptable.</p>	<p>Statement Appendices (Application Document 6.3).</p> <p>The impacts on amenity are described in Chapter 13 People and Communities of the Environmental Statement (Application Document 6.1) and conclude that there would be no likely significant effects on amenity during construction or operation.</p>	<p>detrimental impact of lighting, both during construction (PW-G6 and MW-G28 and 29) and design (D-CH9, 10,11,12 and P-PROW3).</p> <p>The final draft of the OEMP also continues to secure various measures for the control and minimisation of dust, air pollution and exhaust emissions (PW-AIR1 and MW-AIR1 to 5).</p>
5.84 - 5.87	<p>Where the development is subject to an Environmental Impact Assessment, the applicant should assess any likely significant effects on amenity from emissions of odour, dust, steam, smoke and artificial light and describe these in the Environmental Statement.</p> <p>In particular, the assessment provided by the applicant should describe:</p> <ul style="list-style-type: none"> - the type and quantity of emissions; - aspects of the development which may give rise to 	<p>Construction effects associated with odour, dust and smoke, including the predicted type, quantity and receptor locations of emissions are considered within the Environmental Statement (Application Document 6.1). The reasonable steps taken via mitigation measures in Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3) would include those for dust suppression, control and use of equipment/plant and construction traffic management. With the implementation of mitigation measures, no significant effects are likely.</p> <p>The scope of the EIA was discussed with Wiltshire Council and the Environment Agency. The consideration of their comments is included within the specific Environmental Statement chapters to which the comments relate.</p> <p>The potential for odour and steam effects was</p>	<p>The final draft of the OEMP issued at Deadline 9 [REP9-013] continues to secure measures to minimise the detrimental impact of lighting, both during construction (PW-G6 and MW-G28 and 29) and design (D-CH9, 10,11,12 and P-PROW3).</p> <p>The final draft of the OEMP also continues to secure various measures for the control and minimisation of dust, air pollution and exhaust emissions (PW-AIR1 and MW-AIR1 to 5).</p>

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	<p>emissions during construction, operation and decommissioning;</p> <ul style="list-style-type: none"> - premises or locations that may be affected by the emissions; - effects of the emission on identified premises or locations; and - measures to be employed in preventing or mitigating the emissions. <p>The applicant is advised to consult the relevant local planning authority and, where appropriate, the Environment Agency about the scope and methodology of the assessment.</p> <p>The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental</p>	<p>considered during the EIA Scoping stage for the Environmental Statement, and was informed by discussions with Wiltshire Council. No potential effects were identified.</p> <p>The design of the Scheme is such that air quality would be improved during the operational phase of the Scheme. No mitigation is proposed.</p> <p>Chapter 7 Landscape and Visual of the Environmental Statement (Application Document 6.1) assesses the impacts of the proposed artificial lighting for the Scheme during construction and operation (Section 7.9 describes the character of the night sky assessment). During construction, lighting for the construction compounds, the 24-hour tunnelling operation, general working areas in winter months and lighting from construction vehicles on the haul routes will be required. The assessment concludes there would be a slight loss of darkness and a minor adverse impact compared to the existing lighting in the area. The reasonable steps taken via measures to mitigate light nuisance from artificial lighting used as part of the construction phase is identified within</p> <p>Appendix 2.2 OEMP of the Environmental Statement (see Application Document 6.3). During operation, lighting will increase as a result of the variable message signs on the B3083 bridge and River Till Viaduct.</p>	

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	<p>impact on amenity from emissions of odour, dust, steam, smoke and artificial light. This includes the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation</p>	<p>However, vehicle headlights will be screened by the visual screen on the viaduct. There will be a substantial reduction in lighting from vehicles within the WHS as they will be largely contained within the tunnel and under the long bridge, as well as the removal of existing lighting at Longbarrow Junction.</p> <p>There will also not be any additional lighting for the Countess Flyover and therefore the Scheme will not appreciably increase the existing lighting levels within Amesbury. The assessment therefore concludes that there would be a slight beneficial effect.</p>	
5.89	<p>The Secretary of State should ensure the applicant has provided sufficient information to show that any necessary mitigation will be put into place. In particular, the Secretary of State should consider whether to require the applicant to abide by a Scheme of management and mitigation concerning emissions of odour, dust, steam, smoke, artificial light from the development to</p>	<p>As per NPSNN paragraph 5.82 and 5.84-5.87 of this Appendix.</p>	<p>As per update to paragraph 5.82 and 5.84-5.87 of this Appendix.</p>

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	reduce any loss to amenity which might arise during the construction and operation of the development. A construction management plan may help codify mitigation.		
Flood risk			
5.90	Climate change over the next few decades is likely to mean milder wetter winters and hotter drier summers in the UK, while sea levels will continue to rise. Within the lifetime of nationally significant infrastructure projects, these factors will lead to increased flood risks in areas susceptible to flooding, and to an increased risk of flooding in some areas which are not currently thought of as being at risk. The applicant, the Examining	As per NPSNN Paragraph 4.38 the need to adapt to climate change has been taken into consideration as part of the Scheme assessment and design. The assessment has considered a range of weather conditions which might arise, including increased temperatures and increased precipitation. As per NPSNN Paragraph 4.40, 4.41, 4.42, and 4.32 assessment has also been undertaken to consider the potential future increase in flood risk (both in areas which are currently susceptible, or in areas which are not currently at risk) as a result of climate change, and any necessary design requirements to respond to this increased risk.	<p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>The Statement of Common Ground [REP7-005] with the Environment Agency confirms that the climate change allowance methodology in the FRA is agreed (Ref 3.26) and that no outstanding matters are still to be agreed or are in discussion in relation to resilience of the Scheme to climate change.</p> <p>The final Statement of Common Ground with Wiltshire Council confirms that the climate change allowance methodology used in respect of surface water flood risk, land drainage and road drainage is agreed (Refs 3.28.19, 3.29.4) and there are no outstanding matters still to be agreed in relation to this issue.</p>

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	Authority and the Secretary of State (in taking decisions) should take account of the policy on climate change adaptation in paragraphs 4.36 to 4.47.		
5.91	The National Planning Policy Framework (paragraphs 100 to 104) makes clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. But where development is necessary, it should be made safe without increasing flood risk elsewhere. The guidance supporting the National Planning Policy Framework explains that essential transport infrastructure (including mass evacuation routes), which has to cross the area at risk, is permissible	Appendix 11.5 Level 3 Flood Risk Assessment (FRA) of the Environmental Statement (Application Document 6.3) identifies that the Scheme is located within areas at risk of flooding. The Environment Agency's 'Flood Map for Planning' classifies parts of the Order limits as Flood Zone 2 or 3, indicating that there are areas at medium or high probability of flooding. These areas are generally located where the Scheme crosses valley saddles and along Main River (River Till and River Avon) and tributary corridors. Since the Scheme is partially located in Flood Zone 3a and 3b, an Exception Test is required. Chapter 4 of the FRA indicates that the Exception Test is only required for elements of proposed development (Essential Infrastructure) in Flood Zone 3. As described in Chapter 10 of the FRA, where an encroachment within Flood Zone 3 exists assessment has been undertaken through site specific hydraulic modelling. It is demonstrated that under both the Scheme will not have a detrimental impact on flooding, to the satisfaction	<p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>In the Statement of Common Ground [REP7-005] the Environment Agency has agreed the mitigation measures informing the FRA, including items MW-WAT12 and MW-WAT13 of the OEMP, submitted at Deadline 9 [REP9-013], are appropriate for the preliminary DCO design and DCO application.</p> <p>The final Statement of Common Ground with Wiltshire Council confirms that all flood risk matters are agreed (Refs 3.28.11 – 3.28.21, 3.28.23) and there are no outstanding matters are still to be agreed in relation to this issue.</p>

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	in areas of high flood risk, subject to the requirements of the Exception Test.	of the Exception Test.	
5.92 - 5.93	<p>Applications for projects in the following locations should be accompanied by a flood risk assessment (FRA):</p> <ul style="list-style-type: none"> - Flood Zones 2 and 3, medium and high probability of river and sea flooding; - Flood Zone 1 (low probability of river and sea flooding) for projects of 1 hectare or greater, projects which may be subject to other sources of flooding (local watercourses, surface water, groundwater or reservoirs), or where the Environment Agency has notified the local planning authority that there are critical drainage problems. <p>This should identify and assess the risks of all forms of</p>	<p>Appendix 11.5 Level 3 Flood Risk Assessment (FRA) of the Environmental Statement (Application Document 6.3) assesses the risk of all forms of flooding to and from the Scheme. The approach presented in the Flood Risk Assessment is based on the Source-Pathway-Receptor model. As part of following this model the causes or 'sources' of flooding to and from the Scheme are considered based on a review of local conditions and consideration of the effects of climate change using Environment Agency guidance. The nature and likely extent of flooding arising from any one source has also been considered, e.g. whether such flooding is likely to be localised or widespread.</p>	<p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>The Statement of Common Ground [REP7-005] with the Environment Agency confirms that the hydraulic modelling undertaken to determine Flood Zones in the FRA is agreed (Ref 3.26) and that no outstanding matters are still to be agreed.</p> <p>Paragraphs 5.92 and 5.93 of the NPSNN specify that applications for projects in Flood Zones 2 and 3, such as the proposed scheme, should be accompanied by a FRA. The FRA should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these risks will be managed. In the FRA for the Scheme, these requirements are fulfilled in Section 7 (Flood Risk to the Proposed Scheme), Section 8 (Flood Risk from the Proposed Scheme – Temporary Works) and Section 9 (Flood Risk from the Proposed Scheme – Permanent Works) of the FRA.</p>

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	flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account.		
5.94	<p>In preparing an FRA the applicant should:</p> <ul style="list-style-type: none"> - consider the risk of all forms of flooding arising from the project (including in adjacent parts of the United Kingdom), in addition to the risk of flooding to the project, and demonstrate how these risks will be managed and, where relevant, mitigated, so that the development remains safe throughout its lifetime; - take the impacts of climate change into account, clearly stating the development lifetime over which the assessment has been made; 	<p>Appendix 11.5 Level 3 Flood Risk Assessment (FRA) of the Environmental Statement: (Application Document 6.3) meets the requirements which are set by the NPS NN including information to apply the Sequential and Exception tests, and demonstrates that the development remains safe from flooding through its lifetime (taking climate change into account). In addition, with the mitigation which is proposed, the residual risk which the temporary and permanent features of the Scheme would generate for other receptors so is low.</p> <p>The need for safe access and egress routes has been considered within Chapter 10 of Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application Document 6.3). The Scheme is not impacted by flooding and should always remain operational during periods of nearby flooding. The Road Drainage Strategy (ES Appendix 11.3) secured through the DCO, has taken account of climate change in its design to ensure that this can be the case.</p>	<p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>Paragraphs 5.94 to 5.95 of the NPS outline the key considerations in preparing a FRA, including taking into account the effects of climate change over the proposed scheme lifetime, consideration of arrangements for safe access and egress for those using the infrastructure, assessing residual flood risk, and providing evidence of satisfaction of the Sequential and Exception Tests. This FRA assesses the impacts of climate change with regard to fluvial, groundwater and surface water. The proposed scheme is discussed in the context of the Sequential and Exception Tests in section 4 of the FRA.</p>

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	<ul style="list-style-type: none"> - consider the vulnerability of those using the infrastructure including arrangements for safe access and exit; - include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that this is acceptable for the particular project; consider if there is a need to remain operational during a worst case flood event over the development's lifetime; - provide the evidence for the Secretary of State to apply the Sequential Test and Exception Test, as appropriate. 		
5.96	Applicants for projects which may be affected by, or may add to, flood risk are advised	Consultation undertaken as part of the assessment of flood risk is set out in Chapter 4 of Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental	Paragraph 5.96 emphasises the importance of consultation with the Environment Agency, Lead Local Flood Authorities (LLFAs) and other organisations with

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	<p>to seek sufficiently early pre-application discussions with the Environment Agency, and, where relevant, other flood risk management bodies such as lead local flood authorities, Internal Drainage Boards, sewerage undertakers, highways authorities and reservoir owners and operators. Such discussions can be used to identify the likelihood and possible extent and nature of the flood risk, to help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application once it has been submitted and examined. If the Environment Agency has concerns about the proposal on flood risk grounds, the applicant is encouraged to discuss these</p>	<p>Statement Appendices (Application Document 6.3). This includes discussions with the Environment Agency and LLFA both during the scoping of the FRA, and during the statutory consultation on the Scheme. The items which were raised during the statutory consultation and how they have been dealt with are also summarised within Chapter 4 the FRA.</p>	<p>a role in flood risk management. The Scheme FRA and supporting modelling studies have been informed by detailed and regular consultation with relevant parties as set out at paragraph 4.1.4 of the FRA. Flood risk data has been gathered and assessment methodologies and approaches to flood risk mitigation have been agreed.</p> <p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>There are no matters still under discussion or not agreed with the Environment Agency or with Wiltshire Council in relation to flood risk – including local flood risk and in respect of policy compliance - (see Statement of Common Ground with the Environment Agency submitted at deadline 9 [REP9-015] and the final Statement of Common Ground with Wiltshire Council save that both parties have requested more detail to be on the face of the DCO and OEMP, whereas the Applicant's position is that this will be able to be considered through the Requirement 10 process,</p>

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	concerns with the Environment Agency and look to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns, preferably before the application for development consent is submitted.		
5.97	For local flood risk (surface water, groundwater and ordinary watercourse flooding), local flood risk management strategies and surface water management plans provide useful sources of information for consideration in Flood Risk Assessments. Surface water flood issues need to be understood and then account of these issues can be taken, for example flow routes should be clearly identified and	<p>Wiltshire Local Flood Risk Management Strategy has been considered as part of the baseline for Chapter 11 Road Drainage and the Water Environment of the Environmental Statement (Application Document 6.1). The records of past flooding which are relevant to the Scheme are described in Section 11.6.</p> <p>Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application Document 6.3) assesses the risk from all sources of flooding to and from the Scheme, including local sources. Surface water flood risk is described in Chapter 6, and identifies historic flooding events details of which have been obtained from Wiltshire Council. In terms of the level of surface water flooding risk, Chapter 10 indicates the majority of surface water flood risk in the study area is</p>	<p>Paragraph 5.97 relates to assessing local forms of flood risk (for example, groundwater and surface water) and points to local flood risk management strategies and surface water management plans as useful sources of information. All available information on local sources of flood risk were reviewed to inform the Flood Risk Assessment, as set out at paragraph 4.1.5 of the FRA.</p> <p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>For the position of stakeholders, see the response to paragraph 5.96.</p>

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	<p>managed.</p>	<p>categorised as ‘Low’; with some small ‘pockets’ of ‘Medium’ or ‘High’ flood risk. These are typically in valley bottoms and where surface water flow paths are impeded by artificial structures.</p> <p>In terms of Flood Risk to the Scheme and on-going resilience of the Scheme, Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application Document 6.3) indicates that the Scheme is designed to minimise the risk of flooding by incorporating current design standards and future climate change allowances to improve its resilience through the use of sustainable drainage techniques. Therefore the Scheme remains safe from flooding through its lifetime.</p> <p>In terms of Flood Risk from the Scheme, Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application Document 6.3) indicates that any scheme elements which will result in an increase in impermeable area have design mitigation incorporated. The road is designed to minimise the risk of flooding with attenuation features to detain runoff from all events expected to occur with 1% AEP or more frequently. This includes consideration of flow routes: The surface water hydraulic modelling for the Parsonage Down area shows flood depth differences to the existing surface water overland flow path. The proposed</p>	

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		<p>mitigation is to implement a land drainage solution to enable the overland flow path to continue towards the River Till.</p> <p>With the mitigation which is proposed, the residual risk, which the temporary and permanent features of the Scheme would generate for other receptors, is low.</p>	
5.98	<p>Where flood risk is a factor in determining an application for development consent, the Secretary of State should be satisfied that, where relevant:</p> <ul style="list-style-type: none"> - the application is supported by an appropriate FRA; the Sequential Test (see the National Planning Policy Framework) has been applied as part of site selection and, if required, the Exception Test (see the National Planning Policy Framework). 	<p>A Flood Risk Assessment has been prepared, and is provided at Appendix 11.5 of the Environmental Statement Appendices (Application Document 6.3). The Environmental Agency classifies land affected by the Scheme as Flood Zone 2 or 3, indicating that there are areas at medium or high probability of flooding. The presence of Flood Zone 3 requires that flood risk is assigned as a high importance. These areas are generally located at valley saddles and along Main River and tributary corridors.</p> <p>The approach regarding the Sequential Test and Exception Test are as per NPSNN paragraphs 5.94 of this Appendix.</p>	<p>Section 4.1.14 of the FRA summarises the application of the sequential test which concludes the scheme has to also pass the Exception test in accordance with the NPPF.</p> <p>Section 4.1.20 of the FRA states how the Exception test has been passed. This states that the scheme provides wider sustainability benefits, is safe for users and does not materially affect flood risk elsewhere.</p> <p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>For the position of stakeholders, see the response to paragraph 5.96.</p>
5.99	<p>When determining an application, the Secretary of State should be satisfied that flood risk will not be increased elsewhere and only consider</p>	<p>These requirements are satisfied. The approach regarding the Sequential Test and Exception Test are as per NPSNN paragraphs 5.94 of this Appendix.</p> <p>The approach to ensuring the Scheme is suitably flood</p>	<p>Due to the linear nature of the scheme, it is essential that the road crosses over watercourses and therefore over known areas shown to be at high flood risk. As such, the FRA provides the evidence to demonstrate compliance with the Exception Test.</p>

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	<p>development appropriate in areas at risk of flooding where (informed by a flood risk assessment, following the Sequential Test and, if required, the Exception Test), it can be demonstrated that:</p> <ul style="list-style-type: none"> - within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and - development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and priority is given to the use of sustainable drainage 	<p>resilient is as per NPSNN Paragraph 5.97 of this Appendix.</p> <p>The need for safe access and egress routes has been considered within Chapter 10 of Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application Document 6.3). The Scheme is not impacted by flooding and should always remain operational during periods of nearby flooding. The Road Drainage Strategy (ES Appendix 11.3) secured through the DCO, has taken account of climate change in its design to ensure that this can be the case.</p>	<p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>For the position of stakeholders, see the response to paragraph 5.96.</p>

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	- systems.		
5.100	<p>For construction work which has drainage implications, approval for the project's drainage system will form part of any development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010.93 In addition, the development consent order, or any associated planning obligations, will need to make provision for the adoption and maintenance of any Sustainable Drainage Systems (SuDS), including</p>	<p>Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application Document 6.3), notes that the drainage scheme has been designed according to national SuDS best practice highlighted in Chapter 3. These include the principles of Defra (2015) Sustainable Drainage Systems, Non-statutory technical standards for SuDS and the Design Manual for Roads and Bridges. Further detail is also presented in Appendix 11.3 Road Drainage Strategy of the Environmental Statement (Application Document 6.3). The Applicant will be responsible (as necessary) for maintenance of these features within the land included within the Order limits. The draft DCO (Application Document 3.1) includes in the Requirements (Schedule 2, Part 1) draft requirements which relate to surface water drainage.</p>	<p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council as was the Road Drainage Strategy at Deadline 2 [REP2-009].</p> <p>The final Statement of Common Ground with Wiltshire Council confirms agreement (Ref 3.28.13) that all new drainage proposed as part of the scheme will be SuDS and discharges, peak flow and volume control were considered in the Road Drainage Strategy. The detailed design will be undertaken in accordance with the principles set out in the Road Drainage Strategy and in the OEMP.</p>

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	any necessary access rights to property. The Secretary of State, should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. The responsible body could include, for example, the applicant, the landowner, the relevant local authority, or another body such as the Internal Drainage Board.		
5.101	If the Environment Agency continues to have concerns and objects to the grant of development consent on the grounds of flood risk, the Secretary of State can grant consent, but would need to be satisfied before deciding whether or not to do so that all reasonable steps have	As described within Chapter 4 Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application Document 6.3) consultation with the Environment Agency has been ongoing throughout the design of the Scheme. Based on the conclusions presented in the FRA, as per NPSNN Paragraph 5.91 no such grounds for an objection are anticipated.	The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council. For the position of stakeholders, see the response to paragraph 5.96.

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	<p>been taken by the applicant and the Environment Agency to try and resolve the concerns.</p>		
5.102	<p>The Secretary of State should expect that reasonable steps have been taken to avoid, limit and reduce the risk of flooding to the proposed infrastructure and others. However, the nature of linear infrastructure means that there will be cases where:</p> <ul style="list-style-type: none"> - upgrades are made to existing infrastructure in an area at risk of flooding; - infrastructure in a flood risk area is being replaced; - infrastructure is being provided to serve a flood risk area; and 	<p>The Scheme falls into the second case described in the NPSNN, as the A303 is within areas which are at risk of flooding, and the existing route is being replaced. The steps which have been taken to avoid, limit and reduce flood risk from and to infrastructure are as per NPSNN Paragraphs 5.90. 5.97, 5.103 and 5.104 of this Appendix.</p>	<p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>For the position of stakeholders, see the response to paragraph 5.96.</p>

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	<ul style="list-style-type: none"> - infrastructure is being provided connecting two points that are not in flood risk areas, but where the most viable route between the two passes through such an area. 		
5.103	<p>The design of linear infrastructure and the use of embankments in particular, may mean that linear infrastructure can reduce the risk of flooding for the surrounding area. In such cases the Secretary of State should take account of any positive benefit to placing linear infrastructure in a flood-risk area.</p>	<p>The Scheme will not have any benefits in terms of reducing flood risk for the surrounding area. However, as described in Chapter 8 of Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application Document 6.3), the design will ensure that flood risk to the surrounding area from flooding would be low.</p>	<p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>As detailed in paragraph 10.3.7 of the updated Flood Risk Assessment issued at Deadline 3 the benefits associated with the Scheme include the reduction in flood risk to the B3083 highway due to the provision of the managed drainage arrangements [REP3-008].</p>
5.104	<p>Where linear infrastructure has been proposed in a flood risk area, the Secretary of State should expect reasonable mitigation</p>	<p>The Scheme is not impacted by flooding during the its design life and should always remain operational during periods of nearby flooding, as described in Chapter 3 Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application</p>	<p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>For the updated position of stakeholders, see the</p>

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	<p>measures to have been made, to ensure that the infrastructure remains functional in the event of predicted flooding.</p>	<p>Document 6.3). The Scheme and its drainage measures (as described in Appendix 11.3 Road Drainage Strategy of the Environmental Statement) are designed to manage surface water runoff to minimise the risk of causing flooding elsewhere through the use of attenuation features to detain runoff from all events expected to occur with 1% annual exceedance probability (including climate change) or more frequently. The drainage measures comply with the principles of the non-statutory technical standards for SuDS and the Design Manual for Roads and Bridges (DMRB).</p> <p>Other design measures are embedded into the Scheme design to minimise the potential impact on flood risk. These include:</p> <ul style="list-style-type: none"> a) Siting of permanent facilities outside of the flood zones or surface water flow paths, such as, the operational facilities for the tunnel; and, b) Avoiding the siting of embankments and cuttings within the known floodplains. 	<p>response to paragraph 5.96. The SoCG with the Environment Agency also records the parties' positions in respect of the EA's request for a specific commitment to River Avon enhancement measures.</p>
Flood risk – mitigation			
5.110	To satisfactorily manage flood risk and the impact of the	No planning obligations relating to flood risk management systems are anticipated. Sustainable	The Road Drainage Strategy was updated and submitted at Deadline 2 [REP2-009] further to

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	<p>natural watercycle on people, property and ecosystems, good design and infrastructure may need to be secured using requirements or planning obligations. This may include the use of sustainable drainage systems but could also include vegetation to help to slow runoff, hold back peak flows and make landscapes more able to absorb the impact of severe weather events.</p>	<p>drainage systems have been included within the Road Drainage Strategy (ES Appendix 11.3).</p>	<p>discussions with stakeholders and sustainable drainage systems have been included within it. Requirement 10 of the DCO requires the detailed drainage design to be based on this strategy, which includes SuDs principles.</p> <p>There are no matters still under discussion or not agreed with the Environment Agency or with Wiltshire Council in relation to Drainage (see Statement of Common Ground with the Environment Agency submitted at deadline 9 [REP9-015] and the final Statement of Common Ground with Wiltshire Council albeit that both parties have requested more detail to be on the face of the DCO and OEMP (e.g. in relation to valve control), whereas the Applicant's position is that this will be able to be considered through the Requirement 10 process, It is agreed in the final Wiltshire Council Statement of Common Ground (3.28.13) that, as set out in the Road Drainage Strategy, all new drainage proposed as part of the scheme will be SuDS and discharges, peak flow and volume control to achieve this are also considered in the Road Drainage Strategy. The detailed design will be undertaken in accordance with DMRB requirements and, pursuant to Requirement 10 of the DCO, the principles set out in the updated Road Drainage Strategy.</p>

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5.112 - 5.115	<p>Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.</p> <p>The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect.</p> <p>It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and</p>	<p>As per NPSNN paragraphs 5.97 of this Appendix, the drainage systems for Scheme are designed to minimise the risk of it flooding elsewhere by incorporating current design standards and future climate change allowances.</p> <p>Attenuation and drainage design is considered in Appendix 11.3 Road Drainage Strategy of the Environmental Statement Appendices (Application Document 6.3). Chapter 3 indicates that drainage from the road (excluding areas outside the road, described below) would be sent entirely to infiltration basins. There would be no outfalls to surface watercourses from these basins. Preliminary sizing of the basins has been undertaken to contain the 1 in 100 year rainfall event, including a 30% allowance for climate change and 300mm freeboard. In addition, to take into account the risk of an extreme rainfall event larger than the design standard, exceedance routes from the basins have been identified to ensure any potential risk of damage or disruption to property or infrastructure or livestock caused from flow from the basins would be minimised.</p> <p>No surface water storage or infiltration outside of the site is proposed.</p> <p>New and improved drainage systems are proposed to</p>	<p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>The Road Drainage strategy was updated and submitted at Deadline 2 [REP2-009]. Requirement 10 of the DCO requires the detailed drainage design to be based on this strategy, which includes surface water measures and deals with storage and infiltration issues.</p> <p>For the updated position of stakeholders, see the response to paragraphs 5.96 and .5.110. It is noted that the Statement of Common Ground with Wiltshire Council also outlines Wiltshire Council's agreement that the highway and road drainage design of the B3083 Shrewton Road will reduce the current risk of highway flooding (Ref 3.28.14).</p> <p>As outlined in the final Wiltshire Council Statement of Common Ground (Ref 3.30.1), Wiltshire Council want some of the control systems for the tunnel drainage specified in the OEMP prior to the availability of the details design (this matter is addressed at item 3.1ii of the written summary of oral submissions put at Flood risk, groundwater protection, geology and land contamination hearing on 29 August 2019 [REP8-108]).</p>

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	<p>the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation.</p> <p>The sequential approach should be applied to the layout and design of the project. Vulnerable uses should be located on parts of the site at lower probability and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities can be taken to lower flood risk by improving flow routes, flood storage capacity and using SuDS.</p>	<p>provide land drainage for areas outside of the road. These are also described in Chapter 3 of Appendix 11.3 Road Drainage Strategy of the Environmental Statement Appendices (Application Document 6.3), and may include:</p> <ul style="list-style-type: none"> - ditches to capture surface water flows from natural catchments adjacent to the highways; - measures to convey drainage from groundwater to the River Till or River Avon via a system of ditches or pipes; - bunds to retain surface flows and discharge these to the River Till; - soakaways and infiltration systems to match existing systems on new Sections of the A360, B3038 and Rollestone Cross; - drainage systems to convey groundwater and surface water from the proposed tunnel. <p>With the mitigation which is proposed, the residual risk which the temporary and permanent features of the Scheme would generate for other receptors is low.</p> <p>As described in Chapter 10, Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application Document 6.3) elements of the</p>	

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		<p>Scheme are located in areas which are vulnerable to flooding. The permanent Scheme elements at risk from fluvial flooding include:</p> <ul style="list-style-type: none"> a) The provision of utilities to provide power to the eastern portal crosses the River Avon floodplain and therefore is located within the 1% AEP flood extent; and b) The piers of the River Till viaduct are located within the 1% AEP flood extent. <p>To mitigate potential impacts to the Scheme the installation of vulnerable above ground utilities structures would be located outside of the River Avon 0.1% AEP plus climate change flood extent.</p> <p>The permanent scheme elements at risk from surface water flooding include:</p> <ul style="list-style-type: none"> a) Longbarrow Junction upgrades; b) Twin-bore tunnel, including portals; c) Countess Roundabout flyover; d) Embankments and cuttings; e) Road drainage; and f) High Load route. <p>The road is designed to minimise the risk of it flooding by</p>	

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		<p>incorporating current design standards and future climate change allowances to improve its resilience through the use of sustainable drainage techniques (as described above). With design mitigation,</p> <p>the risk to the Scheme from surface water flooding would be Low.</p>	
Land instability			
5.117 - 5.118	<p>Where necessary, land stability should be considered in respect of new development, as set out in the National Planning Policy Framework and supporting planning guidance. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land instability. If land stability could be an issue, applicants should seek appropriate technical and environmental expert advice to assess the likely consequences of</p>	<p>Section 10.6, Chapter 10 Geology and Soils of the Environmental Statement (Application Document 6.1) details the potential geotechnical hazards affecting the Order land and concludes that there is no significant risk to land instability arising from the Scheme. This conclusion has been reached further to the Appendix 10.6 Land Instability Risk Assessment of the Environmental Statement Appendices (Application Document 6.3) that has been carried out.</p> <p>Given the location of the Scheme and there being no coal resources present, there has been no requirement to liaise with the Coal Authority.</p> <p>Chapter 10 Geology and Soils of the Environmental Statement (Application Document 6.1) summarises the assessment that has been undertaken, and the mitigation which is proposed:</p>	<p>Geology and soils, land stability and related issues were discussed at ISH4 (see written summary of oral submission [REP4-032]).</p> <p>With regards to settlement, the Applicant noted that the Land Instability Risk Assessment Report [APP-278] demonstrated a conservative and precautionary approach. Responding to comments from Stonehenge Alliance, the Applicant noted that potential ground movement and settlement relating to the construction of the tunnel was addressed in the Land Instability Risk Assessment Report.</p> <p>The Applicant added that monitoring of ground movement is addressed in the OEMP at MW-CH8 which requires the production of a Ground Movement Monitoring Strategy.</p>

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	<p>proposed developments on sites where subsidence, landslides and ground compression is known or suspected.</p> <p>Applicants should liaise with the Coal Authority if necessary.</p> <p>A preliminary assessment of ground instability should be carried out at the earliest possible stage before a detailed application for development consent is prepared. Applicants should ensure that any necessary investigations are undertaken to ascertain that their sites are and will remain stable or can be made so as part of the development. The site needs to be assessed in context of surrounding areas where subsidence, landslides and land compression could</p>	<p>Natural cavities:</p> <p>There is a potential for natural cavities to be present, and this has been confirmed during archaeological trial trenching. Natural cavities can often be found present within Chalk in the form of dissolution features which can be present as sinkholes, dissolution pipes and swallow holes. However, it is concluded that the features identified would not pose land instability issues to the Scheme, as they appear to be positioned above the proposed carriageway level, so would be excavated out during construction.</p> <p>Faults and fractures:</p> <p>Potential faulting has been logged during the previous ground investigations and discontinuities have been identified around the proposed tunnel area, which typically vary in nature. The risk from faulting has been assessed in the Appendix 10.1 Preliminary Ground Investigation Report of the Environmental Statement Appendices (Application Document 6.3) and has concluded that such a risk is low.</p> <p>Tunnel construction:</p> <p>The proposed tunnel runs in close proximity to the three buildings at Stonehenge Cottages, situated east of Stonehenge. Based on ground movement analyses</p>	

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	threaten the development during its anticipated life or damage neighbouring land or property. This could be in the form of a land stability or slope stability risk assessment report.	undertaken in the Land Instability Risk Assessment, it is considered that ground movements caused by tunnel construction would not have a significant impact on settlement around the cottages.	
The historic environment			
5.126 - 5.127	<p>Where the development is subject to EIA the applicant should undertake an assessment of any likely significant heritage impacts of the proposed project as part of the Environmental Impact Assessment and describe these in the environmental statement.</p> <p>The applicant should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be</p>	<p>The approach to assigning significance, and assessing effects is proportionate to the highly sensitive location in which the Scheme is located. Section 6.3, Chapter 6 Cultural Heritage of the Environmental Statement (Application Document 6.1) describes the approach taken to assessing effects on heritage within the EIA. The ES chapter is the primary document which reports the Scheme impacts and effects upon heritage assets. It reports the impacts on all designated and non-designated heritage assets, including the Stonehenge, Avebury and Associated Sites WHS. In addition, Appendix 6.1 Heritage Impact Assessment has been undertaken. The purpose of the Heritage Impact Assessment is to assess the potential negative and positive impacts of the Scheme on the OUV of the WHS in accordance with ICOMOS Guidance on Heritage</p>	<p>Archaeological evaluation reports were submitted ahead of Deadline 1 [REP1-039-056] and a Palaeoenvironmental Assessment - Western Portal and Approaches [REP3-023] and Review of Ploughzone Lithics and Tree Hollow Distributions [REP3-024] at Deadline 3. These results either confirmed or provided the detail behind results already reported in the ES Chapter 6 [APP-044] and the HIA [APP-195].</p> <p>Confirmatory surveys and sampling consisting of trial trenching on the Winterbourne Stoke Bypass, test pitting on one part of the Western Portal approach and geophysical surveys at Countess East and Amesbury Road were completed in October 2018. The results of this confirmatory survey and sampling work (included in the reports submitted at Deadline 1) were reviewed against the archaeological baseline, approach to mitigation and assessment of effects presented in the</p>

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	<p>proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant Historic Environment Record should have been consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation.</p>	<p>Impact Assessments for Cultural World Heritage Properties. The Heritage Impact Assessment addresses both designated and non-designated heritage assets that express the OUV of the WHS. It deals only with impacts on OUV, Integrity and Authenticity and does not examine impacts on other designated or non-designated heritage assets that do not contribute to OUV.</p> <p>Section 6.6 Baseline Conditions, Chapter 6 Cultural Heritage of the Environmental Statement (Application Document 6.1) describes the total numbers of heritage asset affected, including archaeological remains, historic buildings and historic landscapes, and the contribution and value derived from their setting. Data on each asset, including information on setting and value/significance is, presented in Appendix 6.2 – 6.6 of the Environmental Statement Appendices (Application Document 6.3).</p> <p>Section 6.3 Assessment Methodology, Chapter 6 Cultural Heritage of the Environmental Statement (Application Document 6.1) notes the sources used to determine the baseline information, which include the Historic Environment Record.</p> <p>As described within Section 6.3 Assessment Methodology, Chapter 6 Cultural Heritage of the Environmental Statement (Application Document 6.1)</p>	<p>ES and they confirm its findings. No changes to the conclusions as to the likely significant effects of the scheme were identified or were required.</p>

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		<p>the baseline has been informed by extensive prior archaeological evaluations and excavations. In addition, field work has been undertaken to inform the Scheme design.</p> <p>Evaluation fieldwork has been carried out for sections of the Scheme within and adjacent to the WHS (eastern portal and approaches, western portal and approaches, new Longbarrow Junction and approaches, and the Rollestone Corner improvement). Much of the Winterbourne Stoke bypass alignment was archaeologically evaluated for previous A303 improvement schemes (see Environmental Statement Appendix 6.10 (Application Document 6.3)). The majority of the land within the Order limits of the proposed scheme has been evaluated by recent detailed archaeological geophysical surveys, either as part of academic projects or in support of the Scheme.</p>	
5.128	<p>In determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (including by development affecting the</p>	<p>As per NPSNN paragraphs 5.126 – 5.127 of this Appendix.</p> <p>Section 6.6 Baseline Conditions, Chapter 6 Cultural Heritage of the Environmental Statement (Application Document 6.1) provides information on the value/significance of each heritage asset, including archaeological remains, historic buildings and historic</p>	<p>See the information referred to in the update for paragraphs 5.126 – 5.127 above.</p> <p>The character and significance of heritage assets, and the contribution that their setting makes to their significance, were further considered in Relevant Representations, Written Representations, written and oral submissions made by interested parties during the examination and the Applicant's responses to them. In</p>

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	<p>setting of a heritage asset), taking account of the available evidence and any necessary expertise from:</p> <ul style="list-style-type: none"> - relevant information provided with the application and, where applicable, relevant information submitted during examination of the application; - any designation records; - the relevant Historic Environment Record(s), and similar sources of information; - representations made by interested parties during the examination; and - expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it. 	<p>landscapes, and the contribution and value derived from their setting. Data on each asset, including information on setting is presented in Appendix 6.2 – 6.6 of the Environmental Statement (Application Document 6.3). Section 6.6, Chapter 6 also details prior consultation and expert advice received, and the data sources and requests that have been undertaken with relevant stakeholders.</p>	<p>terms of the Applicant’s document, these include, among others:</p> <ul style="list-style-type: none"> • the significance of the WHS and Attributes conveying OUV, Integrity and Authenticity [Written summary of oral submissions from ISH2, REP4-030; agenda items 4 (i), (ii) and (iii); and Written summary of oral submissions from ISH8, REP8-016; agenda items 3.1, 3.2 and 3.3]; • the loss of archaeological remains with the footprint of the Scheme [Comments on submissions received at Deadlines 5 and 6, REP7-021; item 6.3.3]; • the setting of the non-designated Blick Mead archaeological site and its contribution to the OUV of the WHS [Response to Written Question CH.2.8, REP6-022; Written summary of oral submissions from ISH2, REP4-030, agenda items 4 (i), (ii) and (iii)]; • the setting of the Amesbury Abbey Registered Park and Garden [Response to Written Question CH.2.8, REP6-022]; and • the setting of Vespasian’s Camp Iron Age hillfort Scheduled Monument Response to Written Question CH.2.8, REP6-022]. <p>Relevant Representations, Written Representations written and oral submissions, and the Applicant’s responses to them, also considered Scheme impacts and</p>

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			effects on: <ul style="list-style-type: none"> the setting of Barrow Groups in the western part of the WHS including the Winterbourne Stoke Crossroads Barrows, the Diamond Group and the Normanton Down Barrows [Response to Written Question LV.2.1, REP6-030]; the setting of the concentration of long barrows in the Wilsford dry valley [Response to Written Question LV.2.1, REP6-030]; and the setting of the Avenue [Deadline 9 submission; Comments on any further information requested by the Examining Authority and received to Deadline 8, response to the CBA item 18.1.6 [REP9-022].
5.129	In considering the impact of a proposed development on any heritage assets, the Secretary of State should take into account the particular nature of the significance of the heritage asset and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the	The consideration of significance of heritage assets is as per NPSNN Paragraphs 5.124 – 5.127 of this Appendix. As per NPSNN Paragraph 2.9 of this Appendix particular attention has been and continues to be given to the cultural heritage aspects of the design of the Scheme, and the protection and enhancement of the WHS is an objective for the Scheme. As per NPSNN Paragraph 5.132 of this Appendix, the Scheme assessment and design has responded to the sensitivity and the value of designated and non-designated heritage assets including the WHS in order to ensure that it provides an overall benefit for this and future generations. These benefits would be experienced by future generations.	The Applicant’s responses to written and oral submissions from interested parties and to written questions, considered the loss of archaeological remains within the footprint of the scheme, their significance, and the value that they hold for future generations (Comments on submissions received at Deadlines 5 and 6, item 6.3.3 [REP7-021 and Comments on any further information requested by the Examining Authority and received to Deadline 8, item 18.2.12 [REP9-022]). See also the response to paragraph 5.128 above with regards to the consideration of the setting of heritage assets in relation to Scheme impacts. Aspects of visitor experience with regards to accessing the WHS landscape were also considered [Response to Written

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	proposal.		Representations, REP3-013, para. 12.3.144].
5.130	<p>The Secretary of State should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities – including their economic vitality. The Secretary of State should also take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and</p>	<p>As stated within Chapter 6 of Appendix 6.1 Heritage Impact Assessment of the Environmental Statement Appendices (Application Document 6.3) the design process has involved extensive consideration of heritage issues, which have influenced the design of the Scheme. The Scheme is heritage-led in terms of its design and incorporates measures built in to the Scheme to minimise impacts and to enhance the significance and setting of heritage assets, such as the removal of the current A303 into a tunnel across the central part of the WHS, the downgrading of the current A303 and parts of the A360 to NMU routes and the provision of large areas of chalk grassland.</p> <p>The Scheme also allows the reconnection of the severed route of the Avenue where it is crossed by the current A303. Placing the new road in tunnel removes the intrusion of the existing road and associated light pollution in views between Stonehenge and the Sun Barrow, restoring an important solstitial alignment. The tunnel would remove the severance due to the existing road between monument groups to the north and south of the A303, in particular between the Normanton Down</p>	<p>A design vision and set of design principles and commitments has been set out in the OEMP, Section 4, to guide the detailed design stage. An updated version of the OEMP was submitted at Deadline 9 [REP9-013].</p> <p>The design of the Scheme and the standards to be applied were discussed at Issue Specific Hearing (ISH) 8 [Applicant's written summary of oral submissions made at ISH8, REP8-016; agenda items 3.1 (i) and item 7].</p>

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	landscaping (for example, screen planting).	<p>Barrows and Stonehenge; Stonehenge Bottom / Luxenborough Barrows and Stonehenge; the Old and New King Barrows and the Coneybury Henge and Associated Monuments and both the north and south parts of the Avenue Barrows.</p> <p>The benefits of the Scheme to the surrounding community, including those who use the WHS are considered within Chapter 13 People and Communities of the Environmental Statement (Application Document 6.1). The benefits include new and improved NMU routes across the WHS, these would both enhance visitor's enjoyment of the WHS, and would have wider benefits in terms of improving the connections between communities such as Winterbourne Stoke and Amesbury, and supporting their sustainability.</p> <p>Economic benefits which are brought about through improvements to Stonehenge are described within Chapter 5 of this Case for the Scheme document and are valued at £955 million, by means of a contingent valuation.</p> <p>The Scheme would support the vitality of nearby communities by allowing the creation of a non-motorised user ("NMU") route linking Winterbourne Stoke with Amesbury, following the line of the removed A303 across the WHS. The NMU route would link English Heritage's</p>	

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		<p>Stonehenge visitor centre with Amesbury, providing opportunities for tourism businesses. There is also opportunity to link with NMU routes beyond the WHS to create an extended network, for example linking with the National Cycle Network which currently passes north to south through Amesbury.</p> <p>The way in which design has influenced the Scheme is described within the DAS(Application Document 7.2). This includes a consideration of scale, height, massing, alignment, materials, use, landscaping and the design decisions which have shaped the Scheme design.</p>	
5.131	<p>When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. Once lost, heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or</p>	<p>The Scheme is in an area which contains a large number of heritage assets and which is therefore highly sensitive to change.</p> <p>Section 6.12, Chapter 6 Cultural Heritage of the Environmental Statement (Application Document 6.1) concludes the assessment does not identify any instance of 'substantial harm' or total loss of significance to any designated asset. This includes the Stonehenge element of the Stonehenge, Avebury and Associated Sites WHS. In addition, Section 6.11, Chapter 6 Cultural Heritage of the Environmental Statement (Application Document 6.1) concludes that the Scheme is assessed to have a beneficial effect on the Attributes of OUV, Integrity and Authenticity of the WHS as a whole.</p>	<p>Matters relating to cultural heritage and the WHS were discussed at ISH2 and ISH8 (see the written summaries of oral submissions made at these hearings [REP4-030 and REP8-016]) – in particular harm to the OUV of the WHS [REP8-016, agenda item 3.1 (i)].</p> <p>Aspects regarding the level of harm to the significance of specific heritage assets arising from the Scheme were discussed at the ISHs and in Relevant Representations and Written Representations, and the Applicant's responses to them. The Applicant's position is unchanged. The Applicant has rebutted assertions with respect to substantial harm to the WHS; see for example the response to Blick Mead Project Team at Deadline 9, item 12.1.2; the Applicant's written summary of oral submissions from ISH8 [REP8-016, agenda item 3.1 (i)]; and Comments on submissions</p>

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	<p>lost through alteration or destruction of the heritage asset or development within its setting. Given that heritage assets are irreplaceable, harm or loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including World Heritage Sites, Scheduled Monuments, grade I and II* Listed Buildings, Registered Battlefields, and grade I and II* Registered Parks and Gardens should be wholly exceptional.</p>	<p>Adverse effects including harm or loss to designated heritage assets are anticipated. Chapter 6 Cultural Heritage of the Environmental Statement (Application Document 6.1) identifies less than 'substantial harm' to the significance of heritage assets relating to negative changes to their setting, arising from the presence of the new road and its associated infrastructure, and/or from changes to the visual and aural impact of traffic during its operation. These effects are as per NPSNN Paragraph 5.134 of this Appendix. These instances of less than substantial harm are outweighed by the Scheme benefits as per NPSNN Paragraph 5.134 of this Appendix and it is therefore considered that this harm is justified on that basis.</p>	<p>received at Deadline 4 [REP5-003, para. 11.2.34 and para. 34.1.16]. Assertions with respect to substantial harm to Blick Mead have been rebutted in Comments on submissions received at Deadline 4 [REP5-003, para. 34.1.42] and with respect to Amesbury Abbey and Amesbury Abbey Registered Park and Garden have been responded to in Response to Written Question CH.2.8 [REP6-022] and the Applicant's Deadline 9 submission; Comments on any further information requested by the Examining Authority and received to Deadline 8, response to the Amesbury Abbey Group item 2.1.2 [REP9-022].</p>
5.132	Any harmful impact on the significance of a designated	As per NPSNN Paragraph 5.129 of this Appendix, particular attention has been and continues to be given to	Matters relating to cultural heritage, the WHS and the balance of harm weighed against the public benefit

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	<p>heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss.</p>	<p>the cultural heritage aspects of the design of the Scheme, and the protection and enhancement of the WHS is an objective of the Scheme design. As per NPSNN paragraphs 5.131 of this Appendix. The OUV of the WHS would be sustained overall by the construction of the Scheme. The assessment of effects on the WHS is considered in Appendix 6.1 Heritage Impact Assessment of the Environmental Statement (Application Document 6.3). It is concluded that the impacts of the Scheme have been minimised such that effects on Attributes of OUV are slight adverse at worst and significant beneficial at best.</p> <ul style="list-style-type: none"> - The Scheme would bring substantial benefits to large parts of the WHS, in particular the tunnel section where very large beneficial effects would be experienced by Stonehenge itself (Attribute of OUV 1) and large beneficial effects would be experienced by its solstitial alignment (Attribute of OUV 4). - beneficial effects would be experienced in relation to the siting of monuments in relation to each other (Attribute of OUV 5), within the landscape without parallel (Attribute of OUV 6), and with regards to the influence that the monuments and their landscape setting have on architects, artists, historians, archaeologists and others (Attribute of OUV 7). 	<p>were discussed at ISH8 (see written summary of oral submission [REP8-016, agenda item 3.1 (i)]).</p> <p>The Applicant has addressed assertions with respect to substantial harm to the WHS; see for example the response to Blick Mead Project Team at Deadline 9, item 12.1.2, the Written summary of oral submissions made at ISH8 [REP8-016, agenda item 3.1 (i)]; and Comments on submissions received at Deadline 4 [REP5-003, para. 11.2.34 and para. 34.1.16].</p>

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		<ul style="list-style-type: none"> - adverse effects would be experienced by physical archaeological remains (Attribute of OUV 2). There would be adverse effects upon the siting of monuments in relation to the landscape (Attribute of OUV 3) due to the positioning of new cuttings within the WHS (western and eastern approach roads and portals), which avoid known archaeological remains that contribute to the OUV of the WHS, but partially introduce new severance and impacts on the setting of heritage assets and Asset Groups. <p>Less than substantial harm is anticipated to affect designated and non-designated assets, including those within the WHS and this is considered below as per NPSNN Paragraph 5.134. The Scheme does not identify any instance of 'substantial harm' or total loss of significance to a designated asset.</p> <p>There is a long-standing, fully evidenced need for the benefits of this Scheme to be realised, as demonstrated by numerous policy documents which define the need for the scheme. In addition to the overall heritage benefits, this Scheme would deliver a range of substantial economic, transport, environmental and community benefits, which are summarised in Table 5-1, Chapter 5 of this Case for the Scheme document. The design of the scheme strikes an appropriate balance between</p>	

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		<p>delivering the Scheme requirements and minimising harm to designated heritage assets in this archaeologically and historically important location. The limited harm to designated heritage assets reported in the ES confirms that this is a successful balance which enables the conclusion to be drawn that the Scheme benefits outweigh this limited harm.</p>	
5.134	<p>Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.</p>	<p>Chapter 6 Cultural Heritage of the Environmental Statement (Application Document 6.1) identifies less than ‘substantial harm’ to the significance of heritage assets relating to negative changes to their setting, arising from the presence of the new road and its associated infrastructure, and/or from changes to the visual and aural impact of traffic during its operation. These effects are summarised in tables 6.11 and 6.12 of the Environmental Statement.</p> <p>Less than substantial harm is anticipated to affect designated and non-designated assets, including those within the WHS as summarised below.</p> <ul style="list-style-type: none"> - Barrow groups and ring ditches at Winterbourne Stoke West, Winterbourne Stoke Hill, Diamond Barrows, Countess Farm Barrows, and Normanton Gorse Barrows. These contain scheduled monuments and contribute to expressing Attributes 	<p>Matters relating to cultural heritage, and the WHS and the balance of harm weighed against the public benefit were discussed at ISH8 (see written summary of oral submissions [REP8-016, agenda item 3.1 (i)]). Also see the Applicant’s response to Blick Mead Project Team submissions at Deadline 9, items 12.1.2 and 12.1.3.</p>

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		<p>of the OUV of the WHS.</p> <ul style="list-style-type: none"> - The setting of non-designated assets conveying Attributes of OUV, comprising a series of non-designated undated ring ditches north and northwest of Vespasian's Camp. - The setting of listed buildings, including those located close to Countess Roundabout and at Countess Farm, or to the existing A303 in Amesbury. - The setting of Amesbury Conservation Area, and Amesbury Abbey Registered Park and Garden. - The loss of archaeological remains within the Scheme footprint, which collectively contribute to the understanding of activity in this part of the WHS, but are not considered to contribute to OUV. <p>The Scheme would also result in significant beneficial effects on the setting of Asset Groups and on designated isolated and discrete assets which contribute to the OUV of the WHS. These are detailed in Heritage Impact Assessment Sections 6.9 and 6.10, and summarised in Section 9.4, Chapter 9 of the Heritage Impact Assessment. Chapter 11 of the Heritage Impact Assessment sets out the overall impact and significance of effect of the Scheme on the OUV of the WHS.</p>	

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		<p>Alignment with the 2015 Stonehenge, Avebury and Associated Sites WHS Management Plan vision, aims and policies is considered in Section 12.3 of the Heritage Impact Assessment.</p> <p>The Scheme is assessed to have beneficial effects for a number of designated heritage assets on the route of the present A303 between Longbarrow Roundabout and the junction with Stonehenge Road. These include Grade I and Grade II Listed structures, including milestones and markers. In each case the beneficial effect is due to the conversion of the present A303 to a restricted byway.</p> <p>There is a long-standing, fully evidenced need for the benefits of this Scheme to be realised, as demonstrated by a numerous policy documents which define the need for the scheme. The design of the scheme strikes an appropriate balance between delivering the Scheme requirements and minimising harm to designated heritage assets in this historically important location, whilst delivering overall heritage benefits as described in 5.137 below.</p> <p>In addition to the heritage benefits, the Scheme would deliver a range of substantial economic, transport, environmental and community benefits, which are summarised in Table 5-1, Chapter 5 of this Case for the</p>	

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		Scheme document. These benefits are considered to outweigh the less than substantial harm.	
5.135	Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. The Secretary of State should treat the loss of a building (or other element) that makes a positive contribution to the site's significance either as substantial harm or less than substantial harm, as appropriate, taking into account the relative significance of the elements affected and their contribution to the significance of the Conservation Area or World Heritage Site as a whole.	<p>The relative significance of assets within the WHS and conservation areas, and their individual contribution are described within Chapter 6, Appendix 6.1 Heritage Impact Assessment of the Environmental Statement Appendices (Application Document 6.3).</p> <p>The assessment reported in Chapter 6 Cultural Heritage of the Environmental Statement (Application Document 6.1) does not identify any instances where a loss of a building or other element that makes a positive contribution to the WHS would occur.</p>	<p>The loss of archaeological remains within the footprint of the Scheme within the WHS was addressed in Responses to submissions made at Deadline 5 and 6 [REP7-021; item 6.3.3]. In terms of Mesolithic remains at Blick Mead not being part of the OUV of the WHS, see the Applicant's written summary of oral submissions from ISH2 [REP4-030, Agenda Item 4(i)-(iii)] and the Applicant's responses to written questions CH.1.8 and CH.1.17 [REP2-025].</p> <p>In terms of Asset Groups that may contribute to the OUV of the property that sit either partially outside or wholly outside the existing boundary of the WHS, and the contribution of Asset Groups in the vicinity of the western portal, see the Applicant's response to written question LV.2.1 [REP6-030].</p>
5.136	Where the loss of significance of any heritage asset has been justified by the applicant based on the merits of the new development and the	The Scheme would result in the loss of some archaeological remains of low and medium value both outside and within the WHS and would change the setting of scheduled monuments close to the western and eastern approach cuttings. No preliminary works	<p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013].</p> <p>The draft DCO (revised at Deadline 9 [REP9-003])</p>

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	<p>significance of the asset in question, the Secretary of State should consider imposing a requirement that the applicant will prevent the loss occurring until the relevant development or part of development has commenced.</p>	<p>(including advanced archaeological mitigation works) would commence either within the WHS or outside it until the DCO is granted by the Secretary of State. Relevant controls on these preliminary works are included in the OEMP, which is secured by a DCO requirement.</p>	<p>includes the following as part of Requirement 4, to ensure appropriate archaeological mitigation secured by the DAMS (and measures under the OEMP more generally) is in place prior to the commencement of preliminary works:</p> <p><i>(4) Subject to paragraphs (5) and (10), no part of the preliminary works is to begin until a preliminary works CEMP for that part has been submitted to and approved in writing by the Secretary of State, following the consultation specified in the preliminary works OEMP.</i></p> <p><i>(5) No part of the preliminary works in respect of which a heritage management plan, site specific written scheme of investigation or archaeological method statement is required under the preliminary works OEMP is to begin until each of those documents required for that part has been submitted and approved in writing by the planning authority, following the consultation specified in the preliminary works OEMP.</i></p>
5.137	<p>Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those</p>	<p>The Scheme is heritage-led and seeks to avoid and minimise adverse impacts on the OUV of the WHS where reasonably practicable. Appendix 6.1 Heritage Impact Assessment of the Environmental Statement Appendices (Application Document 6.3) indicates the Scheme would enhance and better reveal the significance of the WHS and its OUV by:</p>	<p>Matters relating to cultural heritage and the WHS were discussed at ISH8 including the design of the Scheme and relevant standards (see written summary of oral submissions [REP8-016 agenda item 7]). A design vision and set of design principles and commitments has been set out in the OEMP, Section 4, to guide the detailed design stage, an updated version of which was submitted at Deadline 9 [REP9-013].</p>

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	<p>elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.</p>	<ul style="list-style-type: none"> Improving the aural and visual environment of the Stonehenge monument by providing it with an uncluttered and respectful setting that reflects the iconic status of the monument and its cultural significance within the WHS. Substantially enhancing the setting of the Stonehenge monument, providing the opportunity to reconnect it physically and visually with the wider WHS to the south. This would improve views to and from the monument, relationships between the monument and other monuments in the WHS landscape and, importantly, the visitor experience at the monument. Removing traffic and modern road infrastructure from views towards the winter solstice sunset. Minimising light pollution related to the A303 Scheme by omitting highway lighting where reasonable practicable within the WHS and concealing traffic and visibility of car head and tail lights by placing the road in tunnel and cutting through the WHS. Reducing the current adverse effects of the existing surface A303 route on the setting of heritage assets and the OUV of the WHS by placing the road in a 	<p>The heritage consultees have also agreed the Detailed Archaeological Mitigation Strategy (DAMS) which contains a Public Archaeology and Community Engagement (PACE) strategy in Appendix E [DAMS as submitted at Deadline 9], aimed at increasing the public's awareness, understanding and perception of the OUV of the WHS. The DAMS also adopts a research-led approach with the intention to apply the highest practicable standards of mitigation, employing innovative approaches to address a question-based research strategy, which will further understanding of the WHS and its OUV.</p> <p>In terms of making a positive contribution and better revealing the significance of the WHS, the Scheme will create opportunities for greater public access, and appreciation and enjoyment of the WHS, as explained in the response to written question G.1.1, paragraph 8 [REP2-021].</p> <p>Note: the correct tunnel length is 3.285km.</p>

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		<p>tunnel across the WHS for approximately 1.9 miles (approximately 3.0km). This would reduce the physical and contextual severance and remove visual clutter and distraction from sightlines between a number of significant monuments, including the Avenue,</p> <ul style="list-style-type: none"> • Stonehenge, the Normanton Down Barrows, barrow cemeteries on King Barrow Ridge and numerous barrows to the south of the existing A303. • Enhancing the WHS by relocating the Longbarrow Junction outside the WHS, reducing physical and visual severance, noise and light intrusion. • Maximising the public benefit of archaeological work conducted in connection with Scheme route identification, design and impact assessment and mitigation via post- excavation assessment, publication, dissemination and public outreach. • Maximising opportunities to reconnect the WHS landscape and providing the opportunity to widen accessibility and circulation to key archaeological sites within the wider WHS landscape. This aims to enable the eventual exploration of the landscape on foot by downgrading the existing A303 through the WHS and redundant sections of the A360 to restricted byways, and introducing new rights of way 	

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		for NMUs, in order to increase public awareness and enjoyment. <ul style="list-style-type: none"> Enabling opportunities for the transmission of OUV and increasing the public’s awareness, understanding and perception of the OUV of the WHS. 	
5.138	Where there is evidence of deliberate neglect of or damage to a heritage asset the Secretary of State should not take its deteriorated state into account in any decision.	The Statement of OUV commentary on protection and management requirements ⁵³ indicates that <i>‘the A303 continues to have a negative impact on the setting of Stonehenge, the integrity of the property and visitor access to some parts of the wider landscape’</i> . This negative impact cannot be considered ‘deliberate neglect’ or ‘damage’. However, the Statement of OUV and the WHS Management Plan both state the ambition to remove the existing A303 which impacts negatively on the OUV of the WHS.	Highways England addressed the assertion that removal of the A303 has not been committed to in either the WHS’s designation or its SoOUV in its Comments on submissions received at Deadline 7 [REP8-013; item 6.2.19]. The Statement of Significance for the Stonehenge, Avebury and Associated Sites WHS, was agreed by UNESCO in 2008. It is derived from the nomination and evaluation documentation of 1985/6. The Statement of Significance (2008) was subsumed into the Statement of Outstanding Universal Value Integrity and Authenticity (the "SoOUV") (2013)." (Simmonds & Thomas 2015, p.261). The impacts of roads are highlighted in the SoOUV’s statement on integrity: “The presence of busy main roads going through the World Heritage property impacts adversely on its integrity.” One road clearly ‘goes through’ the property: the A303.” Both busyness and severance are issues, including with respect to the existing A303.
5.139	A documentary record of our past is not as valuable as retaining the heritage asset		The Applicant has made detailed submissions (in response to assertions from interested parties) during the Examination with respect to the interpretation of this

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	<p>and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given.</p>		<p>paragraph; see the Applicant’s response at Appendix B to its oral summary of the ISH on Cultural Heritage [REP4-030] and in the Applicant’s written summary submitted at Deadline 8 (Agenda Item 3.1(i)) [REP8-016]. This point was also addressed at paragraph 2.1.4 of the Applicant’s response to Deadline 7 submissions [REP8-013], and in the Applicant’s Deadline 9 response to submissions made at Deadline 8 (see item 18.2.11).</p> <p>The DAMS (the final version of which is submitted at Deadline 9 [REP9-017]) explains at paragraph 5.1.1:</p> <p><i>“In accordance with DMRB, priority will be given to the preservation of archaeological remains within the DCO boundary. Where avoidance of remains is not possible, measures will include protection of remains within working areas, preservation of archaeological remains that are required to be covered over temporarily (e.g. in compound areas or beneath temporary roads), and preservation of archaeological remains that will be permanently covered beneath shallow fill.”</i></p> <p>The Applicant submits (by reference to the case law referred to in its responses referred to above) that the effect of paragraph 5.139 is not that the recording of evidence may not be taken into account by the Secretary of State; rather recording of evidence should be considered alongside all other factors in assessing the planning balance applying to the Scheme, including the environmental, economic and OUV benefits that it</p>

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			delivers.
Landscape and visual impacts			
5.144 - 5.146	<p>Where the development is subject to EIA the applicant should undertake an assessment of any likely significant landscape and visual impacts in the environmental impact assessment and describe these</p> <p>in the environmental assessment. A number of guides have been produced to assist in addressing landscape issues. The landscape and visual assessment should include reference to any landscape character assessment and associated studies, as a means of assessing landscape impacts relevant to the proposed project. The</p>	<p>Chapter 7 Landscape and Visual Impact Assessment of the Environmental Statement (Application Document 6.1) assesses the likely significant landscape and visual impacts of the Scheme.</p> <p>Section 7.2, Chapter 7 Landscape and Visual Impact Assessment of the Environmental Statement (Application Document 6.1) takes into account the local landscape policies in the Wiltshire Core Strategy (2015) and the saved policy C6 of the Salisbury District Local Plan (2003).</p> <p>Section 7.3, Chapter 7 Landscape and Visual Impact Assessment of the Environmental Statement (Application Document 6.1) explains that district level published landscape character areas including those within the South Wiltshire and Salisbury District Landscape Character Assessment (2008) have been identified as landscape receptors for the assessment.</p> <p>As discussed in Section 7.3, Chapter 7 Landscape and Visual Impact Assessment of the Environmental Statement (Application Document 6.1) the construction phase assessment has been undertaken based upon</p>	<p>The Applicant made submissions about landscape character assessments and associated studies in its Summary of oral submissions made at ISH3 relating to Agenda Item 3 (iv) [REP4-031].</p> <p>The Applicant has made submissions about the inclusion of tranquillity and consideration of noise in the landscape and visual impact assessment at item 5(iii) of ISH3, as recorded in the Written summary of oral submissions [REP4-031] and in reponse to the ExA's Written Questions LV.2.4 [REP6-030] and Ns.2.1 [REP6-031].</p>

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	<p>applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England.</p> <p>The applicant's assessment should include any significant effects during construction of the project and/or the significant effects of the completed development and its operation on landscape components and landscape character (including historic landscape characterisation).</p> <p>The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include any noise and</p>	<p>winter conditions, when most vegetation is not in leaf and there would be greater visibility of the construction activity compared to summer months. The significance of construction effects on the landscape character, and historic landscape character components is as described in Table 7.11.</p> <p>An operational assessment has been undertaken at:</p> <p>a) year 1 and during winter, when most vegetation is not in leaf and there would be greater visibility of the construction activity compared to summer months. This represents a maximum effect scenario; and</p> <p>b) year 15 and during summer, when the existing vegetation and proposed planting is in leaf and fully established, such that there is a reduced visibility of the Scheme, representing a minimum effect scenario.</p> <p>The significance of operational effects on the landscape character, and historic landscape character components is as described in Tables 7.12 and 7.13 Chapter 7 Landscape and Visual Impact Assessment of the Environmental Statement (Application Document 6.1).</p> <p>Section 7.9, Chapter 7 Landscape and Visual Impact Assessment of the Environmental Statement (Application Document 6.1) considers effects on tranquillity, and how this would affect people. This</p>	

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	light pollution effects, including on local amenity, tranquillity and nature conservation.	<p>includes noise and light pollution effects. Disturbance from noise effects, and impact on nature conservation is considered within Section 8.9, Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1).</p> <p>Environmental Statement Appendix 7.2 (Application Document 6.3) explains the assessment methodology which has drawn upon The Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, April 2013 and Highways England Interim Advice Note 135/10 (2010).</p>	
5.149	Landscape effects depend on the nature of the existing landscape likely to be affected and nature of the effect likely to occur. Both of these factors need to be considered in judging the impact of a project on landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints, the aim should be	<p>The existing landscape is described in Section 7.6, Chapter 7 Landscape and Visual Impact Assessment of the Environmental Statement (Application Document 6.1) as is the nature of the effects likely to occur.</p> <p>Section 7.8 explains how, as part of the design process, a series of principles were established based upon the local landscape character areas, so as to successfully integrate the Scheme within the existing landscape. These have included maximising landscape enhancement opportunities; minimising lighting and land take; provision of planting, earthworks and use of false cuttings; improved NMU connectivity; and appropriate structural design to retain character and reduce overall massing in sensitive areas.</p>	Section 4 of the Outline Environmental Management Plan (REP-13] provides the Design Vision which sets out the development of the Scheme design. With reference to OEMP para 4.2.5 the purpose of the Vision includes (at (e)) to demonstrate how the detailed design will take account of the criteria for good design as set out in the National Policy Statement for National Networks, to ensure it is sustainable infrastructure, sensitive to its place, efficient in the use of natural resources and energy used in their construction, matched by an appearance that demonstrates good aesthetics as far as possible.

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	to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.		
5.156	<p>Outside nationally designated areas, there are local landscapes that may be highly valued locally and protected by local designation. Where a local development document in England has policies based on landscape character assessment, these should be given particular consideration. However, local landscape designations should not be used in themselves as reasons to refuse consent, as this may unduly restrict acceptable development.</p>	<p>Chapter 7 Landscape and Visual Impact Assessment of the Environmental Statement (Application Document 6.1) considers the effects of the Scheme on local landscape character including a Special Landscape Area in Section 7.9. The effects on Local Character Areas (LCA) are summarised in Table 7.11 (Construction), 7.12 (Operation – Year 1), at 7.13 (Operation – Year 15).</p> <p>Regarding construction effects, Chapter 7 concludes that construction activities would have likely significant temporary adverse effects on the rural landscape, including in terms of direct changes to landform and tranquillity. This would be particularly noticeable across the River Till valley and at Longbarrow junction.</p> <p>Regarding operational effects, Chapter 7 concludes that the Scheme would have the following effects:</p> <ul style="list-style-type: none"> - significant adverse effects on the rural landscape between Berwick Down and Longbarrow Junction in the opening year, including for effects to landform 	<p>Wiltshire Council did not on balance identify any conflict with the development plan policies relating to landscape or visual impact in its Local Impact Report [REP1-057]. As a result, it must be concluded that the Scheme accords with this paragraph of the NPSNN.</p>

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		<p>and tranquillity;</p> <ul style="list-style-type: none"> - significant permanent adverse effects on the landscape of the River Till valley; - significant permanent beneficial effects on the townscape within Winterbourne Stoke; - significant permanent beneficial effects on the pattern, tranquillity and connectivity of the landscape within the WHS. 	
5.157	<p>In taking decisions, the Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including by reasonable mitigation.</p>	<p>Chapter 6 of the DAS (Application Document 7.2) describes how landscape and appearance has been taken into consideration within various elements of the Scheme to ensure the Scheme is sensitive to its setting. As described within Chapter 6 of the DAS, a central aim of the Scheme has been to remove the existing A303 from the part of the WHS around Stonehenge to improve its setting and relationships with the site's wider landscape in order to enhance the OUV of the WHS. The new A303 alignment has been designed to sit comfortably within the WHS, with minimal visibility in the wider landscape setting. This has been achieved through the provision of a carefully positioned tunnel. Further landscape and visual mitigation which is proposed to reduce the Scheme's effects during construction and operation is described in Tables 7.4 and 7.5 Chapter 7 Landscape and Visual Impact</p>	<p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013]. This draws upon all the principles in the DAS and sets out the Vision and measures for achieving the detailed design of the Scheme, which include landscape integration to avoid adverse effects and minimise the harm to the landscape as set out in paragraph 4.2.6 (b), with part of the purpose of the Vision being to demonstrate how the detailed design will take account of the criteria for good design as set out in the National Policy Statement for National Networks, to ensure it is sustainable infrastructure, sensitive to its place, efficient in the use of natural resources and energy used in their construction, matched by an appearance that demonstrates good aesthetics as far as possible, as set out in OEMP para 4.2.5 (e).</p> <p>The Scheme has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid</p>

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		<p>Assessment of the Environmental Statement (Application Document 6.1) and secured in the OEMP. Table 7.11, 7.12, at 7.13 in Chapter 7 Landscape and Visual Impact Assessment of the Environmental Statement (Application Document 6.1) describes the effects on LCAs. Of the 13 LCAs considered, effects would range from very large to moderate adverse effects during construction and large adverse to large beneficial effects during the opening year. However, these effects would become more beneficial as landscaping matures, and all but one character area considered would experience beneficial effects in year 15 of operation. At the Upper Till Floodplains and Meadows LCA the impact would remain large adverse.</p> <p>Construction and operational mitigation is described within Tables 7.5 and 7.6 of the Chapter 7 Landscape and Visual Impact Assessment of the Environmental Statement (Application Document 6.1).</p>	adverse effects on landscape or to minimise harm to the landscape, and all reasonable mitigation has been provided for.
5.159	Reducing the scale of a project or making changes to its operation can help to avoid or mitigate the visual and landscape effects of a proposed project.	As per NPSNN paragraphs 5.157 and 5.158 of this Appendix, once operational, and landscaping has matured the Scheme would result in both beneficial and adverse visual and landscape effects. By placing a section of the A303 in tunnel, the existing adverse impacts of the A303 on landscape and visual receptors	In terms of the proposed Limits of Deviation (LoD) of up to 200m in a generally westerly direction for the western portal, this would not result in a change to the assessment of likely significant effects assessed in the Environmental Statement Chapters 6 (Cultural Heritage, APP-044) and 7 (LVIA, APP-045) or the HIA [APP-195]. See the Applicant's response to written

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	<p>However, reducing the scale or otherwise amending the design or changing the operation of a proposed development may result in a significant operational constraint and reduction in function. There may, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in scale or function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape effects outweigh the marginal loss of scale or function.</p>	<p>within the WHS would be improved. In locations where adverse landscape and visual effects are anticipated the Scheme design has sought to avoid or minimise these effects where reasonably practicable through mitigation. Where adverse effects remain, these could not be minimised by reducing the scale of the Scheme, or further amending the design without resulting in an operational or an environmental constraint.</p>	<p>question DCO.1.25 [REP2-030] and to LV.1.21 [REP2-033].</p>
5.160	<p>Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure, design (including choice of materials), and landscaping</p>	<p>The DAS (Application Document 7.2) includes a consideration of visual appearance (including materials). Visual appearance and impacts of the Scheme have been a key factor in both selection the preferred route, and the design of elements of the Scheme. An overview of landscape design, and detailed analysis of Scheme</p>	<p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013], including a design vision and design principles in Section 4. The OEMP 'Vision' specifically includes reference to siting, design and materials within the Vision's Overall Aims as set out in paragraph 4.2.6. Examples from the OEMP include D-CH22 (The tunnel</p>

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	<p>Schemes, depending on the size and type of proposed project. Materials and designs for infrastructure should always be given careful consideration.</p>	<p>elements is set out in Section 5.3 of the DAS (Application Document 7.2). This describes how the landscape design proposals have been developed with the aim of integrating the highways engineering aspects of the Scheme into the existing landscape and screening traffic from key visual receptors. The measures which are proposed (as described below) include siting, design (including materials) and landscaping.</p> <p>Western section, including Winterbourne Stoke bypass to Longbarrow Junction:</p> <ul style="list-style-type: none"> • Integration of new earthworks into the existing rolling downland landscape by grading out of the embankments and rounding off the top of cuttings; • Removing the road from Winterbourne Stoke, reducing the scale of the carriageway and thereby improving the appearance of the village and Winterbourne Stoke Conservation Area; • Landscape enhancement through the re-creation of calcareous species rich grassland - a key characteristic of Salisbury Plain and a nationally rare habitat; • A planting strategy to respond to the landscape character and management objectives of Parsonage 	<p>buildings shall be underground so that only the front façades of the tunnel buildings shall be visible), and D-CH24 (Boundary fencing and gates in the WHS shall be visually recessive and have a low reflectivity finish).</p>

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		<p>Down NNR;</p> <ul style="list-style-type: none"> • Landscaping and planting to aid the Scheme's integration. Central section, within the WHS: • Provision of Green Bridge 4 to maintain physical and visual continuity in the landscape, and protect the landscape setting of archaeological features. • Establishing species rich grassland within cutting areas. • Maximising non-motorised users (NMU) opportunities within the WHS via 'green bridges', re-use of the existing A303 and connectivity to existing byways. • Eastern section: Countess Junction to just beyond the Solstice Park Junction: • Siting the eastern portal of the tunnel east of The Avenue, which is currently severed by the A303 • Establishing species rich grassland within cutting areas. • Providing planting and landscaping within the Countess junction. <p>The assessment of construction and operational mitigation is also described within Tables 7.5 and 7.6, Chapter 7 Landscape and Visual Impact Assessment of the Environmental Statement (Application Document</p>	

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		6.1).	
Land use including open space, green infrastructure and Green Belt			
5.168	<p>Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality.</p> <p>Applicants should also identify any effects, and seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed. Where possible, developments should be on</p>	<p>Chapter 13 People and Communities in the Environmental Statement (Application Document 6.1) indicates:</p> <ul style="list-style-type: none"> - During construction, the Scheme would result in disturbance to approximately 268ha of Best and Most Versatile (BMV) agricultural land (Grade 1, Grade 2 and 3a). The overall temporary effect of the Scheme on BMV agricultural land is significant adverse. - Following construction and restoration, the area of agricultural land that would be permanently required for the Scheme is approximately 38.5ha. Of this 38.5ha, the permanent requirement for 30ha of BMV land in Grade 2 and 3a is assessed as an impact of major magnitude. The overall permanent effect of the Scheme on BMV agricultural land is significant adverse. <p>The Scheme was identified through a thorough options identification process, as described in Chapter 3 Assessment of Alternatives in the Environmental Statement (Application Document 6.1). The appraisal of</p>	<p>Geology and soils, land stability and related issues were discussed at ISH4 on Flood Risk, Groundwater, Geology and Waste (see written summary of oral submission [REP4-032]).</p> <p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013].</p>

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	<p>previously developed (brownfield) sites provided that it is not of high environmental value. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination and how it is proposed to address this.</p>	<p>alternative options involved consideration of environmental effects, including effects on agricultural land. Although the preferred route, which forms the basis of the Scheme, involved loss of agricultural land it performed better from a heritage, landscape and biodiversity perspective. These were the primary basis for determining the location of the Scheme. Due to the Scheme's location within a rural area, it has not been possible to use brownfield sites ahead of agricultural land.</p> <p>Chapter 10 Geology and Soils of the Environmental Statement (Application Document 6.1) identifies the potential sources of land contamination within and in the vicinity of the Order Limits (Table 10.9 and Figure 10.2 illustrate the study area). It also assesses the impacts on soil quality and the risks posed by the Scheme as a result of land contamination and sources of contamination. As a result of appropriate control measures during construction which are identified in Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3), there are not expected to be any significant adverse effects on soil quality; or significant risks posed by disturbance of land suspected to be contaminated such as military sites and fuel stations; interaction with the High Pressure Oil</p>	

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		<p>Pipeline; or as a result of the storage of potentially hazardous materials on construction compounds.</p> <p>The design of the Scheme also includes measures that will contain and control any releases of contaminants along the highway and its associated infrastructure during operation e.g. drainage design to prevent/minimise the risk of discharging pollutants into the chalk aquifer via drainage pathways.</p>	
5.173	<p>Where the project conflicts with a proposal in a development plan, the Secretary of State should take account of the stage which the development plan document has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented or precluded. The closer the development plan document is to being adopted by the local plan, the greater the weight which can be attached to the impact of the proposal on the plan.</p>	<p>Scheme compliance with the NPPF and local planning policies is described in Appendix B. The Scheme does not conflict with any proposals in a development plan document.</p> <p>The development plan for the area comprises the Wiltshire Core Strategy incorporating saved policies from district local plans, Minerals and Waste Plans and made Neighbourhood Plans. The Wiltshire Core Strategy (WCS) was adopted on 20 January 2015. The plan provides a planning policy framework for Wiltshire for the period up to 2026. Emerging planning policy and neighbourhood plans are not considered in this document, as explained in the policy assessment in Appendix B.</p>	<p>Wiltshire Council have provided a commentary on the Development Plan policies which it considers to be relevant in Annex A of the Local Impact Report (LIR) [REP1-057]. Within Annex A of the LIR, Wiltshire Council identifies where the Scheme is considered to be either not compliant or only partially compliant with individual policies of the Development Plan.</p> <p>A response is provided in Appendix A of the Applicant's response to the LIR [REP3-014] relating to those areas considered to be of non or partial compliance by Wiltshire Council.</p> <p>As confirmed in the written summary of oral submissions made at the Issue Specific Hearing 2 on Cultural Heritage [REP4-030], Mr Taylor QC noted that Wiltshire Council's Local Impact Report [REP1-057] indicated that on balance the Scheme complies with Core Policies 6, 58 and 59. This position was confirmed by Paul Brown QC, on behalf of Wiltshire Council, who</p>

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			submitted that overall the balance is in favour of the Scheme.
5.175	Where networks of green infrastructure have been identified in development plans, they should normally be protected from development, and, where possible, strengthened by or integrated within it. The value of linear infrastructure and its footprint in supporting biodiversity and ecosystems should also be taken into account when assessing the impact on green infrastructure.	<p>The Wiltshire Core Strategy Proposals Map identifies indicative greenspace to the south of Amesbury. The Scheme would not involve any loss of this identified land.</p> <p>The Scheme would create a network of green infrastructure, and the ecosystems benefits of this are as per NPSNN paragraph 5.180 of this Appendix.</p>	Please refer to item 5.180.
5.176	The decision-maker should take into account the economic and other benefits of the best and most versatile agricultural land. The decision-maker should give little weight to the loss of agricultural land in grades 3b,	In addition to the quantity and value of the agricultural land which would either be temporarily disturbed, or lost due to development, Chapter 13 People and Communities in the Environmental Statement (Application Document 6.1) considers agricultural holdings, the characteristics of these holdings and their sensitivity to change, and the effects on agricultural holdings including loss of land and other effects such as	Matters relating to loss of agricultural land (including best and most versatile agricultural land) and the effect of that loss on farm businesses was discussed at the Compulsory Acquisition Hearing (CAH1) (see written summaries of oral submissions [REP5-002]). See also the Applicant's responses to the Examining Authority's First Written Questions and Second Written Questions

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	4 and 5, except in areas (such as uplands) where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy.	<p>severance.</p> <p>Section 13.9, Chapter 13 People and Communities in the Environmental Statement (Application Document 6.1) considers the economic benefits of effected agricultural land, and identifies that overall the Scheme would affect 15 holdings. Of these holdings, seven holdings experience large or moderate adverse effects temporarily which are significant; two remain significantly affected after agricultural land restoration. These holdings which are lost involve 17% and 14% of the land within the respective two effected farms, and would have a consequential effect on the land use and enterprise taking place within these farms.</p> <p>The table below explains the grade of the land affected by the Scheme and the nature of the impacts</p> <table border="1" data-bbox="696 938 1453 1364"> <thead> <tr> <th data-bbox="696 938 848 1177">Agricultural land quality</th> <th data-bbox="848 938 1001 1177">Area required during construction (ha)</th> <th data-bbox="1001 938 1153 1177">Total area restored to unrestricted agriculture (ha)</th> <th data-bbox="1153 938 1305 1177">Total area restored to permanent chalk grassland</th> <th data-bbox="1305 938 1453 1177">Area permanently required</th> </tr> </thead> <tbody> <tr> <td data-bbox="696 1177 848 1241">Grade 1</td> <td data-bbox="848 1177 1001 1241">3.1</td> <td data-bbox="1001 1177 1153 1241">1.0</td> <td data-bbox="1153 1177 1305 1241">2.1</td> <td data-bbox="1305 1177 1453 1241">0</td> </tr> <tr> <td data-bbox="696 1241 848 1305">Grade 2</td> <td data-bbox="848 1241 1001 1305">41.2</td> <td data-bbox="1001 1241 1153 1305">18.0</td> <td data-bbox="1153 1241 1305 1305">20.6</td> <td data-bbox="1305 1241 1453 1305">2.6</td> </tr> <tr> <td data-bbox="696 1305 848 1364">Subgrade</td> <td data-bbox="848 1305 1001 1364">223.2</td> <td data-bbox="1001 1305 1153 1364">85.9</td> <td data-bbox="1153 1305 1305 1364">109.9</td> <td data-bbox="1305 1305 1453 1364">27.5</td> </tr> </tbody> </table>	Agricultural land quality	Area required during construction (ha)	Total area restored to unrestricted agriculture (ha)	Total area restored to permanent chalk grassland	Area permanently required	Grade 1	3.1	1.0	2.1	0	Grade 2	41.2	18.0	20.6	2.6	Subgrade	223.2	85.9	109.9	27.5	on the 'Ag' topic [REP2-022] and [REP6-019] respectively, and the Applicant's comments on Written Representations [REP3-013], which set out the Applicant's position.
Agricultural land quality	Area required during construction (ha)	Total area restored to unrestricted agriculture (ha)	Total area restored to permanent chalk grassland	Area permanently required																			
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		3a					
		BMV agricultural land	267.5	104.9	132.6	30.1	
		Subgrade 3b	29.3	12.4	8.4	8.1	
		Grade 4	0	0	0	0	
		Grade 5	0	0	0	0	
		Non-agricultural land	80.2	0	0 (21.2)	0	
		Total agricultural land	296.8	117.3	162.1	38.5	
		As specified within Section 13.9 Chapter 13 People and Communities in the Environmental Statement (Application Document 6.1), financial compensation would be available to mitigate for the loss of agricultural land. However, there can be no certainty that this would be used to reduce the adverse agricultural effects. Therefore, the conclusions within Section 13.9, and					

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		<p>summarised above represent a worst case, and could be reduced if the owner and/or occupier is able, and chooses, to use compensation payments to replace assets.</p> <p>As per NPSNN Paragraph 5.168 of this Appendix, the Scheme has been identified through thorough options identification process, and the impacts on agricultural land have been weighed against other environmental impacts in selecting the Scheme. In addition, the Scheme delivers a range of substantial economic, transport, environmental and community benefits, which are summarised in Table 5-1 Chapter 5 of this Case for the Scheme document. The substantial benefits which are described are considered to outweigh the adverse effects on agricultural land.</p>	
5.180	<p>Where green infrastructure is affected, applicants should aim to ensure the functionality and connectivity of the green infrastructure network is maintained and any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space, including appropriate access to new coastal access routes,</p>	<p>No identified green infrastructure is affected. Section 8.10 Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1) indicates that proposed habitat creation would improve east-west connectivity and reduce the current north-south fragmentation impacts associated with the current A303. This habitat creation includes higher quality habitats, including drainage swales, hedgerows, and infiltration areas that would further increase the foraging habitat to the north and south of the Scheme, further reducing the likely fragmentation impacts. This mitigation would reduce the habitat fragmentation impacts associated</p>	<p>This matter was discussed in the context of the justification for Green Bridges 1 and 2 at the Issue Specific Hearing (ISH) 6 on Traffic and Transport - see items 4.4 and 4.5 of written summaries of oral submissions made at ISH6 [REP4-034].</p> <p>The Trail Riders Fellowship (TRF) has sought to suggest that not including a link between Byways 11 and 12 as part of the Scheme would cause a breach of this NPS requirement.</p> <p>In its submissions made at Deadline 4a [REP4a-001], ISH6 [REP4-034] and ISH9 [REP8-017], as well as in its Deadline 9 response and Closing Submission documents, the Applicant has set out why it considers</p>

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	National Trails and other public rights of way	<p>with the existing A303.</p> <p>Mitigation measures to reduce the impacts associated with fragmentation are described within Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1) and include the following:</p> <ul style="list-style-type: none"> • green bridge one (Parsonage Down) and associated structural planting at Scotland Lodge; • green bridge two (east of the River Till); • B3083 underbridge; and, • the River Till viaduct would avoid any fragmentation impacts on the commuting route running along the River Till valley. <p>Section 13.8, Chapter 13 People and Communities in the Environmental Statement (Application Document 6.1) describes the mitigation and enhancement measures that are proposed. These would involve enhancements to existing PRoW to improve access through the WHS, and along and across the A303:</p> <ul style="list-style-type: none"> • new PRoWs created in the western section along the de-trunked/downgraded A303, including a new restricted byway on the north and south sides of the new alignment both tying in with PRoW SLAN3, and a new segregated bridleway east from Winterbourne 	that this is not the case – namely that non-motorised users will be able to continue to use the network, motorcyclists will have an alternative route and Byway 12 will still be able to be used.

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		<p>Stoke to the new Longbarrow Junction;</p> <ul style="list-style-type: none"> the provision of 'green bridges' one of which facilitates the realignment of the existing WSTO6B PRow and two of which each provide a new NMU route; and <p>the tunnelling of the A303 and downgrading the current road in that section to a route open to NMUs only.</p>	
5.184	<p>Public rights of way, National Trails, and other rights of access to land (e.g. open access land) are important recreational facilities for walkers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other public rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve access. In considering revisions to an existing right of way consideration needs to be given to the use, character, attractiveness and</p>	<p>Section 13.8, Chapter 13 People and Communities of the Environmental Statement (Application Document 6.1) describes the mitigation and enhancement measures that are proposed. These would involve enhancements to existing PRow to improve access through the WHS, and along and across the A303:</p> <ul style="list-style-type: none"> new PRows created in the western section along the de-trunked/downgraded A303, including a new restricted byway on the north and south sides of the new alignment both tying in with PRow SLAN3, and a new segregated cycleway east from Winterbourne Stoke to the new Longbarrow Junction; the provision of 'green bridges' one of which facilitates the realignment of the existing WSTO6B PRow and two of which each provide a new NMU route; and 	<p>The draft DCO was updated at Deadline 9 [REP9-003].</p> <p>A change to the Scheme's public right of way (PRow) proposals in the vicinity of the Stonehenge Visitor Centre was proposed by the Applicant (in response to an objection from English Heritage Trust to the original proposals) and this was discussed at ISH9 (see written summary of oral submissions [REP8-017]). This change seeks to further improve the amenity of walkers and cyclists following discussions within and outside of ISHs with stakeholders. The Examining Authority confirmed in its 27 September Procedural Decision acceptance of NMC-06 Option B and/or the related 'substitute solution' as described in chapter 5 of the Proposed Changes Consultation Report [REP8-015] and in chapter 5 of the Proposed Changes Position Statement [REP9-027] submitted by the Applicant at Deadline 9.</p> <p>The TRF has sought to suggest that not including a link between Byways 11 and 12 as part of the Scheme would</p>

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	convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent.	<ul style="list-style-type: none"> the tunnelling of the A303 and downgrading the current road in that section to a route open to NMUs only. <p>The measures proposed in respect of public rights of way and which would be attached to a grant of development consent are specified within Schedule 4 of the draft DCO (Application Document 3.1).</p>	<p>cause a breach of this NPS requirement.</p> <p>In its submissions made at Deadline 4a [REP4a-001], ISH6 [REP4-034] and ISH9 [REP8-017], as well as in its Deadline 9 response and Closing Submission documents, the Applicant has set out why it considers that this is not the case – namely that non-motorised users will be able to continue to use the network, motorcyclists will have an alternative route and Byway 12 will still be able to be used.</p>
Noise and vibration			
5.187	Noise resulting from a proposed development can also have adverse impacts on wildlife and biodiversity. Noise effects of the proposed development on ecological receptors should be assessed in accordance with the Biodiversity and Geological Conservation section of this NPS.	Ecology is considered a sensitive receptor that could be affected by changes to noise and vibration. Effects of impacts on wildlife and biodiversity from noise have been assessed in Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1). No likely significant noise effects on wildlife or biodiversity are reported.	<p>No changes have been made to the assessment of noise and vibration impacts on ecological receptors to that reported in the ES.</p> <p>An explicit commitment to non-impact piling at Countess Junction and the River Till has been made in the OEMP (D-NO14 and MW-BIO3), as agreed with Wiltshire Council and the Environment Agency (see response to Ns.2.4 [REP6-031]). An updated version of the OEMP was submitted at Deadline 9 [REP9-013].</p>
5.189	Where a development is	Chapter 9 Noise and Vibration of the Environmental	No changes to the results of the construction and

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	<p>subject to EIA and significant noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment, which should form part of the environment statement:</p> <ul style="list-style-type: none"> - a description of the noise sources including likely usage in terms of number of movements, fleet mix and diurnal pattern. For any associated fixed structures, such as ventilation fans for tunnels, information about the noise sources including the identification of any distinctive tonal, impulsive or low frequency characteristics of the noise. identification of noise sensitive premises and noise sensitive areas that may be affected. - the characteristics of the 	<p>Statement (Application Document 6.1) considers the potential impacts of the Scheme on noise and vibration. The assessment has been undertaken in accordance with the relevant standards and guidance, in particular, British Standards 5228 parts 1 and 2 and DMRB, HD213/11 which covers the various aspects required by NPSNN 5.189, and is proportionate to the effects which are anticipated. The assessment covers daytime and night-time periods.</p> <p>Chapter 9 Noise and Vibration of the Environmental Statement describes the baseline for the Scheme area as predominantly rural in nature. Road traffic noise from the A303 affects the setting of the WHS, particularly in the vicinity of Stonehenge. The existing A303 passes close to residential properties at Amesbury and Winterbourne Stoke and the high existing noise levels along the A303 through Winterbourne Stoke are reflected in the designation of two 'Noise Important Areas' (areas identified by the government as being most exposed to noise) in the vicinity. Noise sensitive receptors, including premises and areas are identified in Section 9.6, Chapter 9 Noise and Vibration of the Environmental Statement (Application Document 6.1):</p> <ul style="list-style-type: none"> • An estimated total of 1,777 residential buildings are located within the 600m noise prediction study area; 	<p>operational assessments as reported in the ES have been made. However, additional sensitivity testing of construction noise effects has been completed assuming quieter plant than assumed in the ES, and including site hoarding, which was not included in the ES (this approach was taken in the ES to ensure a robust assessment was undertaken). The OEMP requires Best Practicable Means (BPM) (PW-NO11 and MW-NO11) to be adopted in terms of the choice of plant and site hoarding to be used to screen activities/receptors. The sensitivity testing demonstrated that the risk of significant adverse noise effects during construction can be avoided at the majority of receptors with the implementation of the assumed measures in the sensitivity test. A risk remains of construction noise levels above the SOAEL at the closest receptors to works at Countess Roundabout during construction of the flyovers and slip roads. However, the duration of the potential exceedance is reduced (further details reported in Appendix 3 of REP4-033).</p> <p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013]. Whilst no fundamental changes to the requirements set out in the OEMP have been made with regard to noise and vibration since the submission of the ES, various mitigation measures have been developed or added.</p>

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	<p>existing noise environment.</p> <ul style="list-style-type: none"> - a prediction on how the noise environment will change with the proposed development: - In the shorter term such as during the construction period; - in the longer term during the operating life of the infrastructure; - at particular times of the day, evening and night as appropriate. - an assessment of the effect of predicted changes in the noise environment on any noise sensitive premises and noise sensitive areas. - measures to be employed in mitigating the effects of noise. Applicants should consider using best available 	<ul style="list-style-type: none"> • Five noise important areas (two in Winterbourne Stoke on the A303 and three in Amesbury on the A345). <p>Sources of noise are described in Section 9.9, Chapter 9 Noise and Vibration of the Environmental Statement (Application Document 6.1), and include:</p> <ul style="list-style-type: none"> • Construction noise and vibration; • Operational traffic noise; • Operational plant/ fan noise associated with the tunnel. <p>Section 9.9, Chapter 9 Noise and Vibration of the Environmental Statement (Application Document 6.1) describes how the noise environment would change, during both construction and operational. The results of this assessment are summarised in Table 9.25, and Table 9.26, and described below:</p> <p>Construction effects:</p> <ul style="list-style-type: none"> - construction activities would have likely significant temporary adverse noise effects for nearby residential properties in close proximity to the works. Including those properties closest to the Countess Roundabout and a property at the northern edge of Winterbourne Stoke; 	

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	<p>techniques to reduce noise impacts.</p> <p>the nature and extent of the noise assessment should be proportionate to the likely noise impact.</p>	<ul style="list-style-type: none"> - significant adverse vibration effects are not anticipated. <p>Operational effects:</p> <ul style="list-style-type: none"> - significant adverse noise effects for a single property on the northern edge of Winterbourne Stoke closest to the section of the A303 which is realigned to the north of the village. - significant adverse noise effects for the closest properties along Church Street and High Street in Amesbury due to the closure of the Stonehenge Road access onto the A303 - significant beneficial noise effects for residents of Winterbourne Stoke located in close proximity to the existing A303 through the centre of the village. - significant beneficial noise effects for visitors to the WHS and residents at Stonehenge Cottages/northern end of Stonehenge Road. - significant beneficial noise effects for residents of properties on the B390 between Shrewton and Chitterne. <p>Design mitigation and enhancement measures are described within Section 9.8, Chapter 9 Noise of the Environmental Statement (Application Document 6.1),</p>	

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		<p>and are summarised below.</p> <p>During construction, these include best practice measures to ensure compliance with measures to limit noise and vibration. These measures are specified within the Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3).</p> <p>During operation, a range of noise reduction measures have been incorporated within the Scheme including:</p> <ul style="list-style-type: none"> - Selection of a route alignment which takes the road away from residential receptors in Winterbourne Stoke; - Use of false cuttings north of Winterbourne Stoke; - Setting the route within a tunnel and deep cutting within the WHS; - Use of thin road surfacing which results in lower levels of noise generation than a standard hot rolled asphalt surface; - Noise barriers at Countess flyover on both sides of the road between the slip roads; - A solid parapet on the southern side of the Till viaduct, tying into screening earthworks on either side. 	
5.190	The potential noise impact	Section 9.9, Chapter 9 Noise and Vibration of the	No update required, however to clarify rail movements

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	elsewhere that is directly associated with the development, such as changes in road and rail traffic movements elsewhere on the national networks, should be considered as appropriate.	<p>Environmental Statement (Application Document 6.1) considers the construction and operational effects on road and rail traffic movements elsewhere, and indicates the changes in noise levels would also be associated with changes in traffic on the local road network, in particular on minor roads to the north through Larkhill, Shrewton and Chitterne which are currently used as alternatives to the A303.</p> <p>Section 9.9, Chapter 9 Noise and Vibration of the Environmental Statement (Application Document 6.1) considers the effects on noise elsewhere on the national network and describes the effects on three Noise Important Areas located on the A345 in Amesbury.</p>	elsewhere are not applicable to the assessment.
5.191	Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. The prediction of road traffic noise should be based on the method described in Calculation of Road Traffic Noise. For the prediction, assessment and management of construction noise, reference should be made to	<p>Chapter 9 Noise and Vibration of the Environmental Statement (Application Document 6.1) considers the potential impacts of the Scheme on construction and operational noise and vibration. The assessment has been in accordance with the British Standards 5228 parts 1 and 2 and DMRB, HD213/11.</p> <p>Section 9.3, Chapter 9 Noise and Vibration of the Environmental Statement (Application Document 6.1) indicates that the prediction of road traffic noise is based on the CRTN.</p>	Confirmation of the appropriateness of the methodology was provided in the response to Winterbourne Stoke Parish Council and Dr A E Shuttleworth written representation [REP3-13].

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	any relevant British Standards and other guidance which also give examples of mitigation strategies.		
5.192	<p>The applicant should consult Natural England with regard to assessment of noise on designated nature conservation sites, protected landscapes, protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be taken into account.</p>	<p>Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1) states that consultation with statutory and non-statutory Nature Conservation Organisations, in particular Natural England, has been undertaken. This included regarding noise and vibration effects on habitats, however Natural England were not concerned due to the proposed low noise piling methods used during construction.</p> <p>Chapter 9 Noise of the Environmental Statement (Application Document 6.1) indicates that Natural England requested that consideration is given to timing of bridge piling works, which could impact on fish movements and other species associated with noise and vibration. Chapter 8 Biodiversity of the Environmental Statement indicates that mitigation is required to avoid impacts on fish in the River Till. Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3) indicates that if any piling for viaduct piers is to be progressed when water is flowing within the River Till, use a low vibration and low noise piling method to reduce the vibration and</p>	<p>To clarify the reference to Natural England within Chapter 9 should have referred to the Environment Agency.</p> <p>There are no matters still under discussion or not yet agreed with Natural England, please refer to issue reference 3.4, whereby Natural England has no objections to the construction mitigation (see Statement of Common Ground [AS-106]).</p> <p>No changes have been made to the assessment of noise and vibration impacts on ecological receptors to that reported in the ES.</p> <p>An explicit commitment to non-impact piling at Countess Junction and the River Till, regardless of if water is flowing, has been made in the OEMP (D-NOI4 and MW-BIO3), as agreed with Wiltshire Council and the Environment Agency (see response to Ns.2.4 [REP6-031]). The commitment to use non-impact piling during construction at the River Till as an appropriate mitigation measure for fish has been agreed with the Environment Agency (see Statement of Common Ground, Item 3.6 [REP7-005]).</p>

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		<p>noise impacts on the aquatic ecology within the river.</p> <p>The results of the noise assessment have informed the ecological assessment. For example, the potential noise effects on habitat degradation and to breeding birds (taking account of seasonality), are described in Section 8.9, Chapter 8 Biodiversity of the Environmental Statement (Application Document 6.1).</p>	
5.193	<p>Developments must be undertaken in accordance with statutory requirements for noise. Due regard must have been given to the relevant sections of the Noise Policy Statement for England, National Planning Policy Framework and the Government's associated planning guidance on noise.</p>	<p>Section 9.2, Chapter 9 Noise of the Environmental Statement (Application Document 6.1) identifies the legislation, policy, regulations, guidance and standards that are relevant to this assessment, including the Noise Policy Statement for England. This also addressed where the policy requirements have been addressed as part of the Scheme assessment.</p> <p>Section 9.3, Chapter 9 Noise of the Environmental Statement (Application Document 6.1) sets out how likely significant effects, in terms of the EIA Regulations, have been identified for noise and vibration.</p>	<p>Whilst raised during the examination, as discussed at ISH5 [REP4-033] and in the response to written question Ns.1.21 [REP2-034], the release of the 2018 World Health Organisation Guidelines would not change the adopted assessment criteria.</p>
5.194	<p>The project should demonstrate good design through optimisation of Scheme layout to minimise noise emissions and, where</p>	<p>Section 9.8, Chapter 9 Noise of the Environmental Statement (Application Document 6.1) details the mitigation proposed in relation to the Scheme. As described in NPSNN Paragraphs 4.3 and 4.31 of this Appendix, reducing the environmental effects of the</p>	<p>See update to 5.189.</p> <p>The Applicant set out in various submissions, including in its response to SWQ Ns.2.5 [REP6-031], why there is no requirement to include a barrier on the northern side of the viaduct crossing the River Till, by reference to the lack of sensitive receptors to the north of the</p>

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	<p>possible, the use of landscaping, bunds or noise barriers to reduce noise transmission. The project should also consider the need for the mitigation of impacts elsewhere on the road and rail networks that have been identified as arising from the development, according to Government policy.</p>	<p>road, including on the setting of the WHS, and existing communities such as Winterbourne Stoke are objectives for the Scheme, and the Scheme layout responds to these objectives. Reducing noise impacts of the road within the WHS and Winterbourne Stoke through provision of a tunnel and bypass of Winterbourne Stoke are central to meeting these objectives. A summary of the mitigation which is proposed to minimise noise emissions includes landscaping, bunds and noise barriers, and is as per NPSNN paragraphs 5.189 of this Appendix.</p> <p>The effects of the Scheme elsewhere on the road network are as per NPSNN Paragraph 5.189 of the Appendix. The need for mitigation elsewhere has been considered as part of the noise assessment, but is not proposed.</p>	<p>River Till.</p>
5.195	<p>The Secretary of State should not grant development consent unless satisfied that the proposals will meet, the following aims, within the context of Government policy on sustainable development:</p> <ul style="list-style-type: none"> - avoid significant adverse 	<p>The Scheme would have both adverse and positive effects associated with noise as per NPSNN Paragraph 5.189 of this Appendix. Where beneficial effects occur, these are expected to benefit health and quality of life.</p> <p>Construction and operational mitigation which is proposed to minimise adverse effect on health and quality of life from noise is as per NPSNN Paragraph 5.189 of this Appendix.</p>	<p>Matters relating to noise were discussed at ISH5 (see written summary of oral submission [REP4-033]).</p> <p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013]. As detailed above in response to para 5.189, various additions and clarifications have been added to the noise and vibration mitigation measures in the OEMP since the completion of the ES, though no fundamental changes have been made. With regard to demonstrating</p>

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	<p>impacts on health and quality of life from noise as a result of the new development;</p> <p>- mitigate and minimise other adverse impacts on health and quality of life from noise from the new development; and</p> <p>contribute to improvements to health and quality of life through the effective management and control of noise, where possible.</p>	<p>The way in which the Scheme has responded to this Policy is considered in detail in Section 9.9, Chapter 9 Noise of the Environmental Statement (Application Document 6.1), as described below.</p> <p><i>Construction</i></p> <p>Significant adverse effects occur for construction noise and vibration levels above the Significant Observed Adverse Effect Level (SOAEL) (see Table 9.3 and Section 9.3, Chapter 9 Noise of the Environmental Statement (Application Document 6.1)) which potentially occur for more than 10 days in 15, or 40 days in 6 months. Adverse effects occur at construction noise or vibration levels between the LOAEL and SOAEL. The third aim applies to all construction noise levels.</p> <p>With regard to the first aim, a significant adverse effect is predicted at this stage at two locations; receptors in close proximity to Countess Roundabout and a receptor north of Winterbourne Stoke. This is due to the close proximity of these receptors to construction activities and the duration of the works. This will be sought to be mitigated through the range of mitigation measures including: selection of quiet and low vibration equipment and methodologies; review of construction programme and methodology to consider low noise/low vibration methods; optimal location of equipment on site to</p>	<p>compliance with policy further detail has been provided since the completion of the ES in response to written questions Ns.1.45 to Ns.1.47, Ns.1.51 [REP2-034] and Ns.2.5 [REP6-031] and at ISH5 (agenda item 5ii [REP4-033]), in particular with regard to the absence of a solid parapet on the northern side of the River Till viaduct. Such a barrier would not avoid a significant adverse effect on health or quality of life, mitigate an adverse effect on health or quality of life, or contribute to an improvement in health or quality of life; and such a barrier is not considered to constitute sustainable development.</p> <p>As confirmed in the final Statement of Common Ground with Wiltshire Council, Wiltshire Council are content that the proposed operational mitigation identified in the ES and secured in the OEMP is suitable and sufficient. No need for a barrier on the north side of the River Till viaduct has been identified.</p> <p>As detailed above in response to para 5.189, additional sensitivity testing of construction noise effects has been completed which demonstrated that the risk of significant adverse noise effects during construction can be avoided at the majority of receptors by the use of quieter plant and screening (as would be implemented under BPM, as secured in the OEMP). A risk remains of construction noise levels above the SOAEL at the closest receptors to works at Countess Roundabout during construction of the flyovers and slip roads. However, the duration of the potential exceedance is reduced (further details reported</p>

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		<p>minimise noise disturbance; the provision of acoustic enclosures around static plant, where necessary; use of less intrusive alarms, such as broadband vehicle reversing warnings; no start-up or shut down of vibratory plant e.g. rollers or compactors, within 50m of receptors and compliance with standard working hours, as recommended by Wiltshire Council, of 7:30am-6pm Monday-Friday and 07:30am-1pm Saturday for the majority of the works. The mitigation measures are set out in Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3).</p> <p>As detailed above the contractors would utilise all sustainable mitigation measures, with the aim of avoiding significant effects. However, at this stage it is anticipated that significant adverse effects are likely to remain. With regard to identifying sustainable mitigation measures, factors including the cost versus the benefit, engineering practicality, any other impacts (such as landscape/visual) and consultation /stakeholder engagement responses are considered. The significant adverse effects likely to remain during construction are acceptable in the context of sustainable development as factors including engineering practicality, cost versus benefit etc., as outlined above, must be considered. On this basis the first aim is met during construction.</p>	in Appendix 3 of REP4-033).

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		<p>With regard to the second aim, adverse effects between the LOAEL and SOAEL are predicted at this stage at a range of receptors. The mitigation and minimisation measures as outlined above, and in Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3) would be applied throughout the works, and therefore would benefit all receptors experiencing construction noise or vibration, including those with levels between the LOAEL and SOAEL. The restriction on the working hours at Countess Roundabout and north of Winterbourne Stoke has been made in order to minimise disturbance to nearby receptors from construction noise. There is an engineering requirement for tunnelling and directly associated activities, namely the STP, SLPP and the delivery of segments, to be undertaken on a 24 hour, 7 days a week basis. The location of these works, including the compound which is remote from sensitive receptors, was made in part to demonstrate that the second aim is met. Construction impacts between the LOAEL and SOAEL are acceptable in the context of sustainable development as factors including engineering practicality, cost versus benefit etc., as outlined above, must be considered. On the proposed mitigation and minimisation measures the second aim is</p>	

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		<p>met during construction.</p> <p>Construction noise and vibration by its nature introduces a new noise or vibration source into the existing environment and is temporary in duration, therefore the opportunity to improve existing noise levels are very limited.</p> <p>Operation</p> <p>Significant operational adverse noise effects occur at traffic noise levels above the SOAEL (see Table 9.7) and adverse effects occur at traffic noise levels between the LOAEL and SOAEL. The third aim applies to all traffic noise levels. Table 9.19 details</p> <p>the number of residential buildings in the study area which are above the SOAEL with and without the Scheme. Almost all the remaining residential buildings are between the LOAEL and the SOAEL, with and without the Scheme, as the night time LOAEL is set at a low level.</p> <p>With regard to the first aim, mitigation measures incorporated within the Scheme design have reduced traffic noise levels from above the SOAEL to below the SOAEL at all affected properties in Winterbourne Stoke and Stonehenge Cottages. This is through the selection of a route alignment which bypasses Winterbourne</p>	

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		<p>Stoke, and setting the route within a tunnel and deep cutting within the WHS past Stonehenge Cottages.</p> <p>The majority of the remaining residential buildings above the SOAEL following the opening of the Scheme are in close proximity to main roads within Amesbury such as the A345. Such routes are already above the SOAEL without the Scheme and experience only a negligible change in traffic noise levels due to the Scheme. The purpose of the Scheme to improve traffic conditions on the A303 by grade separating Countess Roundabout results in small increases in traffic on roads connecting to the junction. The introduction of mitigation measures along existing roads which already experience high noise levels, to mitigate the negligible effect of the Scheme, is not sustainable. Such roads in built up areas have many residential and commercial buildings fronting onto the road, therefore mitigation measures such as barriers are not a practical engineering option and would have other adverse impacts including visual and access difficulties.</p> <p>With regard to the second aim, a range of further mitigation measures have been incorporated into the design as outlined in Section 9.8. These include the use of false cuttings on the bypass north of Winterbourne Stoke with a particular aim of minimising the impact at</p>	

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		<p>Foredown House; maximising the extent of the tunnel portals and green bridge 4; use of a thin surfacing system which results in lower levels of noise generation than a standard hot rolled asphalt surface at speeds at and above 75km/hr; inclusion of approximately 1.8m high absorptive noise barriers between the slip roads on both the north and south side of Countess flyover; and inclusion of an approximately 1.5m high screen on the south side of the River Till viaduct.</p> <p>The decision to include noise barriers at Countess flyover was made in part to demonstrate the second aim is met. The extent of the noise barriers between the slip roads has been maximised within the physical constraints of the flyover. The proposed height of the barriers has resulted from determining a balance between the noise benefit and the visual impact. Feedback from the public consultation events and organisations such as Wiltshire Council, identified the likely benefits of noise barriers at Countess flyover.</p> <p>A barrier at the River Till is not deemed essential noise mitigation to comply with policy, within the context of sustainable development. However, an environmental barrier is proposed which would provide both noise and visual benefits.</p> <p>The inclusion of all the above identified mitigation and</p>	

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		<p>minimisation measures demonstrates that, within the context of sustainable development, at receptors between the LOAEL and the SOAEL the Scheme meets the requirements of the second aim. No areas where additional mitigation would be appropriate, within the context of sustainable development, have been identified i.e. considering engineering practicality, cost/benefit, other potential impacts such as landscape/visual and consultation responses.</p> <p>With regard to the third aim to 'improve where possible', the bypass of Winterbourne Stoke and the use of a tunnel/deep cuttings through the WHS results in significant improvements in traffic noise levels. The noise barriers at Countess are a reasonable balance between the reduction in the traffic noise impact at a significant number of properties and the visual impact of the barriers. On this basis the third aim has been met.</p>	
5.196	In determining an application, the Secretary of State should consider whether requirements are needed which specify that the mitigation measures put forward by the applicant are put in place to ensure that the	Sections 9.8 and 9.9, Chapter 9 Noise of the Environmental Statement (Application Document 6.1) covers noise impacts during construction and operation and identifies appropriate mitigation. As per NPSNN Paragraph 5.189 of this Appendix, these include construction and operational mitigation measures which are set out in the Appendix 2.2 OEMP of the Environmental Statement Appendices (Application	As detailed above in response to para 5.189, various additions and clarifications have been added to the noise and vibration mitigation measures specified in the OEMP since the completion of the ES, though no fundamental changes have been made. The final version of the OEMP was issued at Deadline 9 [REP9-013] and is secured by Requirement 4 of the DCO [REP9-003].

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	noise levels from the project do not exceed those described in the assessment or any other estimates on which the decision was based.	Document 6.3), which itself is secured by DCO requirement.	
5.197	The Examining Authority and the Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. The Secretary of State may wish to impose requirements to ensure delivery of all mitigation measures.	As per NPSNN paragraphs 5.189, 5.195 and 5.196 of this Appendix both construction and operational noise mitigation and design are proposed. Construction mitigation measures are specified within Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3), which itself is secured by DCO requirement.	As detailed above in response to para 5.189, various additions and clarifications have been added to the noise and vibration mitigation measures specified in the OEMP since the completion of the ES, though no fundamental changes have been made. The final version of the OEMP was issued at Deadline 9 [REP9-013] and is secured by Requirement 4 of the DCO [REP9-003]. The Applicant set out in various submissions, including in its response to SWQ Ns.2.5 [REP6-031], why there is no requirement to include a barrier on the northern side of the viaduct crossing the River Till, by reference to the lack of sensitive receptors to the north of the River Till.
5.198	Mitigation measures for the project should be proportionate and reasonable and may include one or more of the following:	The mitigation measures which are proposed are as per NPSNN paragraph 5.189 of this Appendix. It is considered that the mitigation proposed is proportionate and includes all reasonable measures (as far as sustainable), including reducing noise by containing it	As detailed above in response to para 5.189, various additions and clarifications have been added to the noise and vibration mitigation measures specified in the OEMP issued at Deadline 9 [REP9-013] since the completion of the ES, though no fundamental changes have been made. The final version of the OEMP was

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	<ul style="list-style-type: none"> - engineering: containment of noise generated; - materials: use of materials that reduce noise, (for example low noise road surfacing); - lay-out: adequate distance between source and noise-sensitive receptors; incorporating good design to minimise noise transmission through screening by natural or purpose built barriers; - administration: specifying acceptable noise limits or times of use (e.g., in the case of railway station PA systems). 	within noise barriers or bunds, use of materials such as low noise surfacing and through design by minimising its impact on sensitive receptors where reasonably practicable.	issued at Deadline 9 [REP9-013] and is secured by Requirement 4 of the DCO [REP9-003].
Impacts on transport networks			
5.203 - 5.205	Applicants should have regard to the policies set out in local plans, for example, policies on demand management being	Wiltshire Council, the Local Highway Authority, has been consulted on the assessment of transport. The consultation on transport matters is summarised within Section 1.6 of the Transport Assessment (Application Document 7.4). In addition, the Transport Assessment	There are no matters outstanding that are under discussion or not agreed between Highways England and Wiltshire Council in relation to traffic impact (see final issue of Statement of Common Ground).

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	<p>undertaken at the local level.</p> <p>Applicants should consult the relevant highway authority, and local planning authority, as appropriate, on the assessment of transport impacts.</p> <p>Applicants should consider reasonable opportunities to support other transport modes in developing infrastructure. As part of this, consistent with paragraph 3.19-3.22 above, the applicant should provide evidence that as part of the project they have used reasonable endeavours to address any existing severance issues that act as a barrier to non- motorised users.</p>	<p>also indicates how the Scheme has had regard to transport related policies within Wilshire Core Strategy and Wiltshire Local Transport Plan 3 (LTP3).</p> <p>Chapter 13 People and Communities of the Environmental Statement (Application Document 6.1) considers the effects of the Scheme on driver stress and NMUs. Section 13.9 considers NMUs and describes beneficial effects during operation relating to the improved transportation and movement between communities and facilities in the area. The Scheme would reduce existing severance issues experienced by NMUs. There are also significant long-term beneficial effects for pedestrians, cyclists and equestrians during operation arising from the Scheme's propose changes to the PRow network - this will facilitate improved journey times and experiences for NMU users.</p> <p>Chapter 7 of this Case for the Scheme document provides a high level assessment of the Scheme's strategic alignment with current local planning policies.</p>	
5.208	Where appropriate, the applicant should prepare a travel plan including management measures to mitigate transport impacts.	Section 10.4 of the Transport Assessment (Application Document 7.4) indicates that a maximum of 300 workers are expected to be on required during the Construction Phase. As described within Appendix 2.2 OEMP of the Environmental Statement (Application Document 6.1)	<p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013].</p> <p>Matters to be included in the Traffic Management Plan are set out in reference MW-TRA2 of OEMP, which</p>

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	<p>The applicant should also provide details of proposed measures to improve access by public transport and sustainable modes where relevant, to reduce the need for any parking associated with the proposal and to mitigate transport impacts.</p>	<p>Travel Plan would be in place for the workforce which will secure measures such as car sharing, mini-buses. These, combined with the predicted travel by single occupancy vehicles, provide a robust assumption of an average vehicle occupancy of three. In addition, a detailed Traffic Management Plan will be prepared to ensure the safe transition for road users from existing roads to the traffic managed sections of road.</p> <p>Environmental effects associated with construction traffic are considered within the Environmental Statement. Air quality effects associated with construction are as per NPSNN Paragraph 5.84 - 5.87 of this Appendix. No significant effects are anticipated after mitigation measures which are proposed. Noise and vibration effects associated with construction traffic are as per NPSNN Paragraph 5.189 and no significant effects are anticipated after mitigation measures which are proposed.</p> <p>No operational Travel Plan is required, as the Scheme itself is not a source of transport impacts which would need to be addressed within a Travel Plan.</p>	<p>include traffic management measures to be implemented and routes to be used by construction vehicles to access the site. In addition at TRA7, the OEMP provides that haul routes will be provided for use by construction vehicles. Compliance with the OEMP is secured by paragraph 4 of Schedule 2 to the draft DCO [REP9-003].</p>
5.210	<p>If new transport infrastructure is proposed, applicants should discuss with network</p>	<p>The Funding Statement (Application Document 4.2) sets out the funding arrangements for the Scheme, although co-funding is not proposed.</p>	<p>A consolidated updated Funding Statement was submitted at Deadline 2 [REP2-005]. As set out in the comments on written representations</p>

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	<p>provides the possibility of co-funding by Government for any third-party benefits. Guidance has been issued in England which explains the circumstances where this may be possible. The Government cannot guarantee in advance that funding will be available for any given uncommitted Scheme at any specified time, and cannot provide financial support to a Scheme that solely mitigates the impacts of a specific development. Any decisions on co-funded transport infrastructure will need to be taken in the context of the Government's wider policy of transport improvements.</p>		<p>[REP3-013], through its Benefits Steering Group, Highways England is also looking to support stakeholder to plan for the post-scheme future and implement proposals for legacy project improvements to realise the full benefits of the Scheme for local communities and visitors.</p> <p>As noted with the SoCG with the EA submitted at Deadline 9 [REP9-015] Highways England's has also written to the Environment Agency to reiterate that any enhancements in the River Avon or River Till catchments would be considered outside of the scope of the scheme and, as they would not be considered mitigation, cannot be secured as part of the DCO. However, the letter also confirmed Highways England's willingness to work with the EA to put forward a proposal for Highways England's designated funds to contribute to the delivery of the River Avon Restoration Plan objectives.</p>
5.211	The Examining Authority and the Secretary of State should give due consideration to impacts on local transport	Section 2.4 of the Transport Assessment (Application Document 7.4) states that the Scheme aligns with the strategic objectives described in the Wiltshire Local Transport Plan 3 (LTP3) including through minimising	Wiltshire LIR [REP1-057] states that Wiltshire Council agree that the scheme will play a pivotal role in contributing towards the implementation of various key policy and strategy priorities in the Wiltshire Core Strategy and the scheme aligns very closely with the

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	<p>networks and policies set out in local plans, for example, policies on demand management being undertaken at the local level.</p>	<p>traffic delays and disruption and improve journey time reliability on the A303, improving safety for road users and contributing to a reduction of accidents.</p> <p>The Transport Assessment (Application Document 7.4) indicates that the analysis presented:</p> <ul style="list-style-type: none"> - meets the requirements of central government’s transport objectives around economy, environment, social and public accounts; - aligns with national and local planning policy; - addresses future traffic demand and creates improved traffic congestion conditions and journey experience for motorists; - improves facilities for NMUs; and - creates a safer environment for all users. Accident rates are forecast to reduce as a result of the Scheme. <p>Chapter 7 Planning Policy and Legislative Considerations of this document provides a high level assessment of the Scheme’s strategic alignment with current local planning policies.</p>	<p>ambitions of the SWLEP Strategic Economic Plan. Potential traffic impacts have been discussed and mitigation agreed between Highways England and Wiltshire Council (see section 3.1 of the Statement of Common Ground submitted at Deadline 9).</p>
5.212	Schemes should be developed and options	The consideration of policies in local plans is set out in Section 2.3 of the Transport Assessment (Application	Wiltshire LIR [REP1-057] states that Wiltshire Council agree that the scheme will play a pivotal role in contributing towards the implementation of various key

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	considered in the light of relevant local policies and local plans, taking into account local models where appropriate, however the Scheme must be decided in accordance with the NPS except to the extent that one or more of sub-sections 104(4) to 104(8) of the Planning Act 2008 applies.	Document 7.4) and Chapter 7 of this Case for the Scheme document.	policy and strategy priorities in the Wiltshire Core Strategy and the scheme aligns very closely with the ambitions of the SWLEP Strategic Economic Plan. Potential traffic impacts have been discussed and mitigation agreed between Highways England and Wiltshire Council (see section 3.1 of the Statement of Common Ground submitted at Deadline 9).
5.215	Mitigation measures for Schemes should be proportionate and reasonable, focussed on promoting sustainable development.	The Environmental Statement (Application Document 6.1) contains a full and robust assessment of the relevant impacts that are likely to rise from the Scheme, and where significant impacts are identified, sets out ways in which it is proposed that those impacts are avoided, reduced or mitigated. Those mitigation measures themselves take account of relevant policy, inherently including the policy focus on promoting sustainable development. Appendices 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3) (secured through the DCO) details the environmental mitigation measures that would be implemented during construction and operation, why they are required, who is responsible for delivering them	Following ongoing consultation, the OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013]. The OEMP has been updated to include further detail of the control and mitigation measures that will be implemented. Specific examples of changes to the OEMP, including additional commitments are included within the NPSNN paragraph responses contained within this Table. The OEMP also sets out a number of design commitments in respect of the Scheme, and, in section 4, a series of design principles which will inform the detailed design along with a comprehensive engagement process to be followed with stakeholders on the suite of design and environmental management documents that will be developed as the scheme progresses.

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		<p>and detailing ongoing reporting criteria. The mitigation measures proposed as part of the Scheme are proportionate and reasonable, and focussed on promoting sustainable development. The Environmental Masterplan presented in Figure 2.5 (Application Document 6.2) shows the mitigation measures embedded as integral elements of the Scheme design including the green bridges, the new NMU routes, and areas of habitat creation, such as landscaping and the new area of chalk grassland adjacent to Parsonage Down SSSI.</p>	<p>These design principles and additional consultation and mitigation commitments are proportionate and reasonable and will further minimise impacts on the surrounding environment.</p>
5.216	<p>Where development would worsen accessibility such impacts should be mitigated so far as reasonably possible. There is a very strong expectation that impacts on accessibility for non-motorised users should be mitigated.</p>	<p>As per NPSNN paragraphs 3.17, 3.19 and 3.20 of this Appendix.</p>	<p>The TRF has sought to suggest that not including a link between Byways 11 and 12 as part of the Scheme would cause a breach of this requirement.</p> <p>In its Deadline 4a [REP4a-001], ISH6 [REP4-34] and ISH9 [REP8-017] submissions, as well as its Deadline 9 response [REP9-022] and Closing Submission, the Applicant has set out why it considers that this is not the case – namely that non-motorised users will be able to continue to use the network, motorcyclists will have an alternative route and Byway 12 will still be able to be used.</p>
Water quality and resources			

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5.221	<p>Applicants should make early contact with the relevant regulators, including the Environment Agency, for abstraction licensing and with water supply companies likely to supply the water. Where a development is subject to EIA and the development is likely to have significant adverse effects on the water environment, the applicant should ascertain the existing status of, and carry out an assessment of the impacts of the proposed project on water quality, water resources and physical characteristics as part of the environmental statement.</p>	<p>As per NPSNN paragraph 4.54 of this Appendix, early contact with the Environment Agency has been made regarding consent requirements. Further consultation has been undertaken with the water supply companies.</p> <p>Appendix 11.1 Water Quality Risk Assessment of the Environmental Statement Appendices (Application Document 6.3) considers water quality effects.</p> <p>Appendix 11.2 Water Framework Directive Compliance Assessment of the Environmental Statement Appendices (Application Document 6.3) describes the effects on water resources.</p>	<p>An updated Consents and Agreements Position Statement was submitted at Deadline 6 [REP6-007]. Highways England is still not aware of any reason to believe that abstraction licences would not be granted in due course and that arrangements will be able to be put in place with water companies.</p>
5.222	<p>For those projects that are improvements to the existing infrastructure, such as road widening, opportunities should be taken, where</p>	<p>The Scheme involves improvements to existing infrastructure, where this is the case the quality of discharges would be improved. Chapter 11 Road Drainage and Water Environment of the Environmental Statement (Application Document 6.1) considers the</p>	<p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>The Road Drainage strategy was updated and submitted at Deadline 2 [REP2-009].</p>

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	feasible, to improve upon the quality of existing discharges where these are identified and shown to contribute towards Water Framework Directive commitments.	<p>effects of the Scheme on water quality and opportunities to improve quality of existing discharges. Section 11.9 indicates that there would be an improvement in surface water quality due to prevention and treatment of pollution from road runoff and sediment transport.</p> <p>Section 6.2 of the Water Framework Directive Compliance Assessment (Appendix 11.2) of the Environmental Statement Appendices (Application Document 6.3) describes the mitigation measures which are embedded within the design. Regarding discharges, this indicates that infiltration basins would be implemented, including improved amenity grassland along the proposed new A303 alignment. These basins have been designed to include areas which are impermeable and therefore retain water for longer periods of time for biodiversity benefits and drainage attenuation.</p> <p>All of these proposed measures are set out in the Road Drainage Strategy (Environmental Statement Appendix 11.3 (Application Document 6.3) which is secured through the requirements of the DCO.</p>	The OEMP has been updated throughout the Examination, including at Deadline 9 [REP9-013].
5.224	Activities that discharge to the water environment are subject to pollution control. The	The Consents and Agreements Position Statement (Application Document 3.3) identifies the separate water related consents that will be pursued separate and	An updated Consents and Agreements Position Statement was submitted at Deadline 6 [REP6-007], which reflects that a separate abstraction licence will be

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	<p>considerations set out in paragraphs 4.48-4.56 on the interface between planning and pollution control therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the water environment, and to the control regimes relating to works to, and structures in, on, or under a controlled water.</p>	<p>subsequent to the application for development consent. These include:</p> <p>Consent for discharge to controlled water and/or groundwater in accordance with Environmental Permitting (England and Wales) Regulations 2016.</p> <p>The DCO itself will include other consents through its provision for disapplication of the need for external consents and protective provisions for the benefit of regulators. This will include water abstraction and working on and near ordinary watercourses.</p>	<p>required.</p> <p>The draft DCO has been updated; an updated draft DCO was submitted at Deadline 9 [REP9-003].</p>
5.227	<p>The Examining Authority and the Secretary of State should consider proposals put forward by the applicant to mitigate adverse effects on the water environment and whether appropriate requirements should be attached to any development consent and/or planning</p>	<p>The Environment Agency have been issued drafts of the following documents which consider potential effects on the water environment, and identify mitigation to address these effects:</p> <ul style="list-style-type: none"> • Appendix 11.1 Water Quality Risk Assessment of the Environmental Statement Appendices (Application Document 6.3); • Appendix 11.2 Water Framework Directive Compliance Assessment of the Environmental 	<p>The Flood Risk Assessment was updated and submitted at Deadline 3 [REP3-008] following discussions with the Environment Agency and Wiltshire Council.</p> <p>The Road Drainage Strategy was updated and submitted at Deadline 2 [REP2-009] following discussions with the Environment Agency and Wiltshire Council.</p> <p>The Statement of Common Ground between Highways England and the Environment Agency [REP7-005] show that there are no matters not agreed or under discussion relating to water quality and resources.</p>

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	<p>obligations. If the Environment Agency continues to have concerns and objects to the grant of development consent on the grounds of impacts on water quality/resources, the Secretary of State can grant consent, but will need to be satisfied before deciding whether or not to do so that all reasonable steps have been taken by the applicant and the Environment Agency to try to resolve the concerns, and that the Environment Agency is satisfied with the outcome.</p>	<p>Statement Appendices (Application Document 6.3);</p> <ul style="list-style-type: none"> Appendix 11.3 Road Drainage Strategy of the Environmental Statement Appendices (Application Document 6.3); Appendix 11.4 Ground Water Risk Assessment of the Environmental Statement Appendices (Application Document 6.3); <p>Appendix 11.5 Level 3 Flood Risk Assessment of the Environmental Statement Appendices (Application Document 6.3).</p> <p>Mitigation measures to protect the water environment will be secured within Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3).</p>	<p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013].</p> <p>The Environment Agency in the SoCG [REP9-015] confirmed that it welcomes that an Outline Environmental Management Plan (OEMP) has been produced, which will influence the detailed design and inform the other environmental documents that need to be produced and implemented at the detailed stage of the project.</p>
5.229	<p>The Secretary of State should consider whether the mitigation measures put forward by the applicant which are needed for operation and construction (and which are over and above any which may form</p>	<p>Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3) details the environmental mitigation measures proposed to be implemented during construction, why they are required, who is responsible for delivering them and detailing ongoing reporting criteria.</p>	<p>The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013].</p>

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	part of the project application) are acceptable. A construction management plan may help codify mitigation.		
5.231	The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be marked clearly.	<p>Section 11.8, Chapter 11 Road Drainage and the Water Environment of the Environmental Statement describes construction and operational mitigation which is proposed. These includes measures delivered through the design of the Scheme and also via construction methods. The standards which are referred to include good practice embodied in the DMRB.</p> <p>Appendix 2.2 OEMP of the Environmental Statement Appendices (Application Document 6.3) details the environmental mitigation measures proposed to be implemented including why they are required, who is responsible for delivering them and ongoing reporting criteria. Measures include bunding for areas that may generate contaminated water; minimising the extent of groundwater dewatering and groundwater abstraction where practically possible by the construction techniques; water, such as from excavated material and construction compounds, discharged to self-contained units with appropriate treatment facilities; no direct discharges to groundwater; floodplain working would be</p>	The OEMP has been updated during the Examination and the final draft was submitted at Deadline 9 [REP9-013], including provision for the Secretary of State to approve the required Water Management Plan and Groundwater Management Plan, which will include pollution control measures.

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		minimised as far as reasonably practicable; and temporary land-take includes adequate areas of land set aside for robust control measures, for example sustainable drainage control.	

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